STATEMENT OF BASIS

I. Introduction

On May 19, 1980, (45 FR 33066) pursuant to the requirements of Section 3001 through 3006 of the Resource Conservation and Recovery Act, as amended, (RCRA or the Act), the United States Environmental Protection Agency (U.S. EPA) promulgated regulations to protect human health and the environment from the improper management of hazardous waste. Section 3005 of the Act and Code of Federal Regulations, 40 CFR Parts 122 and 124, establish a permit system governing the storage of hazardous wastes. Final regulations for storage facilities appeared in the Federal Register on January 12, 1981. These regulations enable U.S. EPA to issue permits for hazardous waste storage facilities in the State of Ohio which has yet to receive authorization to administer and enforce such permitting activities in lieu of the Federal program under Section 3006 of the Act. A facility which receives a RCRA permit shall comply with U.S. EPA regulations pertaining to design, operation, performance, accident prevention and preparedness, closure and financial responsibility. This Statement of Basis briefly describes the derivation of conditions of the draft permit in support of U.S. EPA's proposal to issue a RCRA permit for E.I. DuPont de Nemours and Company, Tremainsville Road, Toledo, Ohio, to store hazardous wastes.

On May 6, 1983, E.I. DuPont de Nemours and Company submitted its revised and complete application for a RCRA permit in accordance with 40 CFR Section 122.25. To receive a RCRA permit, a facility shall demonstrate compliance with applicable technical standards in 40 CFR Part 264 published on May 19, 1980 (45 FR 33221) and January 12, 1981 (46 FR 2848), as well as financial requirements published on April 7, 1982 (47 FR 15047) and April 16, 1982 (47 FR 16554). After reviewing E.I. DuPont de Nemours and Company's application, U.S. EPA has tentatively determined that the above standards and requirements have been met. The draft permit conditions include all of these requirements. The preambles to the May 19, 1980 and January 12, 1981 regulations explain the rationale for these requirements.

Also incorporated in the draft permit conditions are requirements for the facility to comply with the terms of its proposed Waste Analysis Plan, Preparedness and Prevention Plan, Personnel Training Plan, and Closure Plan. These terms have been determined by U.S. EPA as necessary to comply with the technical standards governing the treatment and storage of hazardous wastes.

II. Facility Description

The Toledo Plant is a wholly owned subsidiary of E.I. DuPont de Nemours and Company. The Toledo facility is primarily a manufacturer of paint and allied products.

The hazardous waste facility includes a container storage pad 310 feet by 15 feet, with a capacity of 56,000 gallons, and 10 carbon steel tanks with a capacity of 24,000 gallons. Hazardous wastes are stored on site in containers or tanks prior to recovery or recycling or shipped off site for disposal. The primary hazardous wastes generated at DP are spent wash solvents. Spent solvent wastes which are contaminated with metals are recovered on site. Spent solvent wastes which are not contaminated with heavy metals are burned in industrial steam boilers for fuel value. Various other hazardous wastes are also generated on site and are shipped off site for disposal.

III. Permit Actions Other Than RCRA

1. DP is currently in the process of attaining an air permit for the use of spent solvents as an industrial boiler fuel.

IV. Summary of the Basis for Permit Conditions

This section of the fact sheet provides a brief summary of the permit conditions in the draft permit. All citations of the regulations refer to the regulations as codified in Title 40 of the Code of Federal Regulations (40 CFR).

Two special terms and conditions have been added as permit conditions in the draft permit. DP shall be required to post warning signs in accordance with 40 CFR 264.14(c). It is the conclusion of the U.S. EPA that DP has not made a successful demonstration under 40 CFR 264.14(a). DP shall not be permitted to burn waste characterized as hazardous for any reason other than ignitability during cold start of boilers.

0032T

A. General Permit Conditions

General permit conditions A.1 to A.25 are regulatory requirement of 40 CFR Part 122, Subpart A and B. These conditions are of a general nature and are applicable to all hazardous waste management facilities regulated pursuant to a U.S. EPA RCRA permit.

Permit Condition	Subject	Basis (40 CFR)
A.1	Effect of Permit	§ 122.13 § 122.7(g)
A.2	Permit Actions	§ 122.7(f) § 122.15 § 122.16 § 122.17 § 264.112
A.3	Duration of Permit	§ 122.9
A.4	Severability	Standard Practice
A.5	Duty to Comply	§ 122.7(a) § 122.28(a)
.6	Duty to Reapply ~~and Permit Expiration~~	§ 122.5 § 122.7(b) ~~§ 122.22(d)~~
A.7	Permit Expiration	122.22(d)
A.8	Need to Halt or Reduce Activity not a Defense	§ 122.7(c)
A.9 ~~A.8~~	Duty to Mitigate	§ 122.7(d)
A.10 ~~A.9~~	Proper Operation and Maintenance	§ 122.7(e)
A.11 ~~A.10~~	Duty to Provide Information	§ 122.7(1) § 264.74(a)
A.12 ~~A.11~~	Inspection and Entry	§ 122.7(i)
A.13 ~~A.12~~	Monitoring and Records	§ 122.7(j)
A.14 ~~A.13~~	Retention of Records	§ 122.7(j)
A.15 ~~A.14~~	Notice of Planned Physical Facility changes	§ 122.7(1)(1)
A.16	Certification of Construction	122.28(c)
~~A.15~~	~~Use of the Facility~~	~~§ 122.28(c)~~
~~A.16~~ A.17 ~~A.16~~	or Modification Anticipated Noncompliance	§ 122.7(1)(2)

A.16 ~~A.17~~	Transfer of Permits	§ 122.14(a) § 122.7(1)(3) § 264.12(c)
A.19 ~~A.18~~	Compliance Schedule ~~Compliance Schedules~~	~~§ 122.10(c)(4)~~
A.20 ~~A.19~~	Twenty-four Hour report-ing of Hazardous Non-compliance	§ 122.7(1)(6) § 122.28(d) § 264.56(d)(i)(j)
A.21 ~~A.20~~	Follow-up written Report of Hazardous Noncompliance	§ 122.7(1)(6)
A.22 ~~A.21~~	Other Noncompliance	§ 122.7(1)(7)
~~A.22~~ A.23	Other information	§ 122.7(1)(8)
~~A.23~~ A.24	Signatory Requirement	§ 122.6 § 122.7(k)
~~A.24~~ A.25	Confidential Infor-mation	122.19
A.26	Documents To be Submitted Prior to Operation	
~~A.25~~ A.27	Document to be Maintained at Facility	§ 264.13(b) § 264.16(d) § 264.53(a) § 264.122(a) § 264.142(a) § 264.73 § 264.15(b)

B. General Facility Conditions

Permit conditions B.1 to B.33 are regulatory requirements of 40 CFR Part 264, Subpart B, C, D, E, G and H. Since these conditions are of a general nature, they are applicable to all facilities which store and/or treat hazardous waste pursuant to an U.S. EPA RCRA permit.

B.1	Design and Operation of Facility	§ 264.31
B.2	Required Notices	§ 122.28(e)
B.3	General Waste Analysis	§ 264.13
B.4	Security	§ 264.14
B.5	General Inspection Requirements	§ 264.15
B.6	Personnel Training	§ 264.16

B.7	General Requirements for Ignitable, Reactive, or Incompatible Waste	264.17
B.8	Location Standards	264.18
B.9	Required Equipment and Testing and Maintenance of Equipment	§ 264.32 § 264.33
B.10	Access to Communications or Alarm System	§ 264.34
B.11	Required Aisle Space	§ 264.35
B.12	Arrangements with Local Authorities	§ 264.37
B.13	Contingency Plan Implementation	§ 264.51
B.14	Content of Contingency Plan	§ 264.52
B.15	Copies of Contingency Plan	264.53
B.16	Amendment of Contingency Plan	264.54
.17	Emergency Coordinator	§ 264.55
B.18	Emergency Procedures Requirements	§ 264.56
B.19	Record of Implementation of Contingency Plan	§ 264.56(j)
B.20	Manifest	§ 264.71 § 264.72 § 264.76
B.21	Operating Record and Availability, Retention and Disposition of Records	§ 264.73 § 264.74
B.22	Annual and Additional Reports	§ 264.75 § 264.77
B.23	Closure Performance Standard	§ 264.111
B.24	Closure Plan	§ 264.112(a)
B.25	Amendment of Closure Plan	§ 264.112(b)
B.26	Notification of Closure	§ 264.112(c)

B.27	Time Allowed for Closure	§ 264.113
B.28	Completion of Closure	§ 264.113(b)
B.29	Disposal or Decontamination of Equipment	§ 264.114
B.30	Certification of Closure	§ 264.115
B.31	Cost Estimate for Closure	§ 264.142
B.32	Financial Assurance for Facility Closure	§ 264.143
B.33	Liability Requirements	§ 264.147
B.34	Incapacity of Owner or Operators, Generators or Financial Institutions	§ 264.148

C Containers

Permit conditions C.1 to C.11 are specific to containers and implement the regulatory requirements of 40 CFR Part 264, subpart I.

C.1	Container Storage Capacity	122.24(f)
C.2	Waste Identification	122.24(g)
C.3	Condition of Containers	§ 264.171
C.4	Compatability of Waste with Containers	§ 264.172
C.5	Management of Containers	§ 264.173
C.6	Inspection	§ 264.174
C.7	Containment System	§ 264.175
C.8	Special Requirement for Ignitable or Reactive Wastes	§ 264.176

C.9	Special Requirements for Incompatible Waste	§ 264.177
C.10	Aisle Space	§ 264.35
C.11	Closure	§ 264.178

D. Tanks

Permit Conditions D.1 to D.6 are specific to tanks and implement the regulatory requirements of 40 CFR Part 264, Subpart J.

D.1	Tank Storage Capacity	122.24(f)
D.2	Waste Identification	122.24(g)
D.3	Design of Tanks	264.191
D.4	General Operating Requirements	264.192
D.5	Special Requirements for Ignitable or Reactive Wastes	264.17(c) 264.198
D.6	Special Requirements for Incompatible Waste	264.17(b) 264.17(c)

E.I du Pont de Nemours and Company
Finishes and Fabricated Products Department
1930 Tremainsville Road
Toledo, Ohio 43613

Permittee [Specify operator (and owner if not the same as operator)] I.D. Number OHD 053411643
Permit Number _____

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations), a permit is issued to [Name of Permittee] (hereafter called the Permittee), to operate a hazardous waste [storage, incineration] facility located in [City and State], on Tremainsville Rd, at latitude 41°41'41" and longitude 83°35'21"

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 122 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit. (See 40 CFR §122.8(b)(2)).

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated August 16, 1982 as modified by subsequent amendments dated _____ and _____ (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §122.15, §122.16 and §122.17) and potential enforcement action. The Permittee must inform EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of [insert date in accordance with §122.15], and shall remain in effect until [insert date in accordance with §122.9], unless revoked and reissued, or terminated (40 CFR §122.9) or continued in accordance with §122.5(a).

MODULE I - STANDARD CONDITIONS

A. EFFECT OF PERMIT

The Permittee is allowed to [store, incinerate] hazardous waste in accordance with the conditions of this permit. Any [storage, incineration] of hazardous waste not authorized in this permit is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606 (a), commonly known as CERCLA), or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 122.15, 122.16, and 122.17. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than non-compliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

A.6

2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires.

A.7

3. Permit Expiration. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR 122.25 and 122.24) and through no fault of the Permittee the Regional Administrator has not issued a new permit as set forth in 40 CFR 264.5.

A.8

4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

A.9

5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.

A.10

6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.

A.11

7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.

A.12

8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

(a) Enter at reasonable times upon the Permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

(d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

P.13 & P.14

Monitoring and Records.

(a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 [insert date of publication], Standard Methods of Wastewater Analysis [insert reference number and date of publication]; or an equivalent method as specified in the attached Waste Analysis Plan [and Trial Burn Plan. (for incinerators that are performing a trial burn)]

(b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

(c) Records of monitoring information shall specify:

(i) The dates, exact place, and times of sampling or measurements;

(ii) The individuals who performed the sampling or measurements;

(iii) The dates analyses were performed;

(iv) The individuals who performed the analyses;

(v) The analytical techniques or methods used; and

(vi) The results of such analyses.

A.15

10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.

P.10

11. Certification of Construction or Modification. Not applicable The Permittee may not commence [storage, incineration] of hazardous waste at the facility until:

(a) The Permittee has submitted to the Regional Administrator by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and

(b) (i) The Regional Administrator has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or

(ii) The Regional Administrator has either waived the inspection or has not within 15 days notified the Permittee of his or her intent to inspect.

[Note: This condition only applies to newly permitted facilities or to permitted facilities which have been modified.]

A.17

12. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

A.18

13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR 122.15(b)(2) or 122.17(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 122.

A.19

14. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

Not applicable

ote: This condition only applies to permits containing compliance schedules.]

2015. Twenty-four Hour Reporting. The Permittee shall report to the Regional Administrator any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

(a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.

(b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

(i) Name, address, and telephone number of the owner or operator;

(ii) Name, address, and telephone number of the facility;

(iii) Date, time, and type of incident;

(iv) Name and quantity of materials involved;

(v) The extent of injuries, if any;

(vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

(vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee need not comply with the five day written notice requirement if the Regional Administrator waives the requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances.

16. Other Noncompliance. The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit are submitted. The reports shall contain the information listed in condition D.15.

17. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.

E. Signatory Requirement. All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR 122.6.

F. Confidential Information. The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR 122.19.

G. Documents To Be Submitted Prior to Operation. [Note: Include here the requirement to submit any documents not complete or ready at time of permit issuance with the schedule for such submission (e.g., an updated contingency plan or the executed financial assurance instruments).]

Not applicable

H. Documents To Be Maintained at Facility Site. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

(1) Waste analysis plan required by 40 CFR 264.13 and this permit.

(2) Personnel training documents and records required by 40 CFR 264.16(d) and this permit.

(3) Contingency plan required by 40 CFR 264.53(a) and this permit.

(4) Closure plan required by 40 CFR 264.112(a) and this permit.

(5) Cost estimate for facility closure required by 40 CFR 264.142(a) and this permit.

(6) Operating record required by 40 CFR 264.73 and this permit.

(7) Inspection schedules required by 40 CFR 264.15(b) and this permit.

MODULE II - GENERAL FACILITY CONDITIONS

A. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

[Note: Permit writers are encouraged to include more specific conditions to implement this requirement when the regulatory basis for such conditions can be established. Throughout the model, conditions where this should be done are indicated in the notes.]

B. Required Notice.

(1) The Permittee shall notify the Regional Administrator in writing at least four weeks in advance of the date the permittee expects to receive hazardous waste from a foreign source. Notice of subsequent shipments of the same waste from the same foreign source in the same calendar year is not required.

(2) When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), he must inform the generator in writing that he has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. (See Condition II.L.1).

[Note: This condition is only applicable if the facility receives waste from off-site.]

C. General Waste Analysis. The Permittee shall follow the procedures described in the attached waste analysis plan, Attachment III .

[Note: The waste analysis requirements of §§264.17, 264.177, 264.198, 264.199, 264,256 264.257 and 264.341 must be covered by the attached plan when applicable.]

D. Security. The Permittee shall comply with the security provisions of 40 CFR 264.14(b) [~~select either~~ (1) or (2) ~~based upon the applicant's submittal~~] and (c).

[Note: The permit writer should include specific security provisions in the permit to ensure compliance with §264.14(b). If the Permittee has successfully demonstrated in accordance with 40 CFR 264.14(a) that the security requirements in §264.14(b) and (c) are not necessary, no security permit condition is needed. This demonstration must be documented

in the administrative record. Specific security provisions needed to implement the performance standard in §264.14(a) should be so included. For example, specify the language of signs required by §264.14(c), if necessary.]

E. General Inspection Requirements. The Permittee shall follow the inspection schedule, Attachment IV. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR 264.15(c). Records of inspections shall be kept as required by 40 CFR 264.15(d).

[Note: When applicable the specific regulatory requirements of §§264.174, 264.194, 264.254, and 264.347 must be covered by the attached schedule.]

F. Personnel Training. The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment V. The Permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e).

[Note: The attached outline is required to be submitted by §122.25(a)(12) and must demonstrate how the Permittee will comply with §264.16]

G. General Requirements for Ignitable, Reactive, or Incompatible Waste. The Permittee shall comply with the requirements of 40 CFR 264.17(a).

[Note: This condition applies only if the Permittee handles ignitable, reactive or incompatible wastes. Conditions specific to different types of storage (i.e., tanks, containers, or piles) which address §264.17(b) and (c) are specified in the proper module.]

H. Location Standards. Not applicable

[Note: Seismic Considerations - If the proposed (new) facility is located in an area listed in Appendix VI of 40 CFR Part 264, the applicant must have demonstrated compliance with 40 CFR 264.18(a). This must be documented in the administrative record.]

[Note: Floodplains - If the proposed (new) facility is not located in a hundred year floodplain, there is no permit condition needed. This must be documented in the administrative record. For facilities located in the 100-year floodplain, the permit must set forth conditions by which the Permittee will meet the requirements of 40 CFR 264.18(b). Existing facilities not in compliance with 40 CFR 264.18(b) must be placed on a compliance schedule (see 40 CFR 122.25(a)(11)( ) and 122.10).]

Preparedness and Prevention

1. Required Equipment. At a minimum, the Permittee shall equip the facility with the equipment set forth in the contingency plan, Attachment VI as required by 40 CFR 264.32.

[Note: The list of equipment required by §264.52(e), in the contingency plan must meet the requirements of §264.32. If the Permittee has successfully demonstrated in accordance with 40 CFR 264.32 that any of the equipment is not required the decision should be documented in the administrative record.]

2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition as necessary to assure its proper operation in time of emergency.

[Note: Specific testing and maintenance procedures needed to implement the above condition, should be included in the permit.]

3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR 264.34.

[Note: If the Permittee has successfully demonstrated that such a device is not required under 40 CFR 264.32, the decision should be documented in the administrative record.]

4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by 40 CFR 264.35.

[Note: If the Permittee has successfully demonstrated that aisle space is not needed for any of the purposes specified in the regulations, the decision should be documented in the administrative record. Plans or specifications which demonstrate how the Permittee will meet this regulatory standard should be referenced and attached to the permit.]

B.12 5. Arrangements with Local Authorities. The Permittee shall attempt to make arrangements with State and local authorities as required by 40 CFR 264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

[Note: The Permittee is required to describe arrangements with local authorities in the contingency plan. (See 40 CFR 264.52(c)).]

J. Contingency Plan.

B.13 1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the contingency plan, Attachment ~~VIII~~ VI and follow the emergency procedures described by 40 CFR 264.56 whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.

B.14 [Note: The Contingency Plan must meet the requirements of §§ 264.51(a), 264.52 and 264.56.]

B.15 2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR 264.53.

B.16 3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 40 CFR 264.54.

[Note: Amendments to the plan are subject to the permit modification requirements of 40 CFR Part 122.]

B.17 4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR 264.55, concerning the emergency coordinator.

[Note: For new facilities, the names, addresses, and phone numbers of all persons qualified to act as emergency coordinators shall be supplied to the Regional Administrator at the time of certification required by condition I.D.11. (See 40 CFR 264.52(d)).]

B.19

Manifest System. The Permittee shall comply with the manifest requirements of 40 CFR 264.71, 264.72, and 264.76.

[Note: This condition applies only to facilities accepting off-site waste.]

B.21

L. Recordkeeping and Reporting.

B.22

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR 264.73(a), (b)(1), (2), (3), (4), (5), (6), (7 [off-site only]), and (8).

2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR 264.75.

M. ~~Closure~~.

B.23

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR 264.111 and in accordance with the closure plan, Attachment VII.

[Note: The Closure Plan must meet the requirements of 40 CFR 264.112(a). The specific closure requirements of §§264.178, 264.197, 264.258 and 264.351 must be covered by the attached plan when applicable.]

B.24

2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR 264.112(b) whenever necessary.

B.25

[Note: Amendments to the closure plan are subject to the permit modification requirements of 40 CFR Part 122.]

B.26

3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure.

B.27

4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment VII. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the closure plan, Attachment VII.

B.28

B.29

5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate [and/or] dispose of all facility

equipment as required by 40 CFR 264.114 and the closure plan, Attachment VII.

B.30 O. Certification of Closure. The permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR 264.115.

N. Cost Estimate for Facility Closure.

B.31

1. The Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR 264.142(b).

[Note: The annual inflation adjustment of the closure cost estimate is not subject to the permit modification requirements of 40 CFR Part 122.]

2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan as required by 40 CFR 264.142(c).

[Note: The above revision is subject to the permit modification requirements of 40 CFR Part 122.]

3. The Permittee must keep at the facility the latest closure cost estimate as required by 40 CFR 264.142(d).

B.32 O. Financial Assurance for Facility Closure. The Permittee shall demonstrate continuous compliance with 40 CFR 264.143 by providing documentation of financial assurance, as required by 40 CFR 264.151, in at least the amount of the cost estimates required by permit condition II.N. Changes in financial assurance mechanisms must be approved by the Regional Administrator.

[Note: For new facilities, the permittee shall demonstrate compliance with this permit condition by submitting the required documentation to the Regional Administrator at least 60 days before first receiving hazardous waste for treatment, storage or disposal. (See for example 40 CFR 264.143(a)(1)). The Permittee's financial assurance must be effective prior to the permittee's first receipt of hazardous waste. For existing facilities, the Permittee shall demonstrate compliance with this permit condition by submitting documentation of its compliance with the 40 CFR Part 265 financial assurance regulations to the Regional Administrator before issuance of the permit.]

B.33

Liability Requirements. The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR 264.147 and the documentation requirements of 40 CFR 264.151, including the requirements to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million, exclusive of legal defense costs.

[Note: The Regional Administrator may grant a variance from the above levels of financial responsibility in accordance with §264.147(c) and (d). For new facilities, the Permittee shall demonstrate its compliance with this permit condition by submitting the required documentation to the Regional Administrator at least 60 days before first receiving hazardous waste for treatment, or storage. The Permittee's liability coverage must be effective before the Permittee's first receipt of hazardous waste. For existing facilities, the Permittee shall demonstrate its liability coverage for sudden accidental occurrences in compliance with this permit condition by submitting the required documentation to the Regional Administrator before issuance of the permit.]

B.34

Incapacity of Owners or Operators, Guarantors, or Financial Institutions.

The permittee shall comply with 40 CFR 264.148 whenever necessary.

MODULE III - STORAGE IN CONTAINERS

[Note: Inspection requirements (§264.174), waste analysis requirements (§264.177, if necessary), and closure requirements (§264.178) must be covered in conditions II. E, II. C, and II. M respectively.]

A. Waste Identification. The Permittee may store the following wastes in containers at the facility, subject to the terms of this permit:

[Note: The permit writer should identify which wastes or classes of wastes the Permittee is allowed to handle in containers. The permit should also specify location, maximum capacity and size, and types of containers based on the regulatory requirements of 40 CFR Part 264. For example, the maximum number of containers may be determined from the Permittee's closure cost estimate which is based on maximum inventory. The location of containers may be based on keeping incompatible wastes separate. Type of container may be based on the requirement that the wastes and the container be compatible. Parts of the permit application that address these requirements should be attached.].

B. Condition of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the the conditions of this permit.

C. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR 264.172.

[Note: Specific procedures or equipment required to assure compliance with this standard should be included in the permit (e.g., liner specifications, testing procedures, etc.).]

D. Management of Containers. The Permittee shall manage containers as required by 40 CFR 264.173.

E. Containment. The Permittee shall construct [for new or modified facilities only] and maintain the containment system in accordance with the requirements of 40 CFR 264.175 as specified in the attached plans and specifications, Attachment VIII.

[Note: The design plans and operating specifications attached to the permit must demonstrate how the Permittee will meet all the requirements of 40 CFR 264.175. The administrative record should so indicate. It should be noted that §264.175(b) addresses areas that store liquid wastes in containers. Section 264.175(c) addresses areas that store only solid wastes in containers.]

F. Special Requirements for Ignitable or Reactive Waste. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.

[Note: This condition is necessary only if the facility handles ignitable or reactive wastes.]

G. Special Requirements for Incompatible Waste.

1. Prior to placing incompatible wastes or incompatible wastes and materials in the same container, the Permittee shall comply with 40 CFR 264.17(b) specified in Attachment VIII.

[Note: The attachment should specify how the Permittee will handle incompatible wastes so as to comply with 40 CFR 264.17(b). If the application does not address this, the permit writer should write specific conditions to implement this requirement or should condition the permit so as not to allow this practice.]

2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.

3. The Permittee shall separate containers of incompatible wastes as indicated in the attached plans, Attachment VIII, as required by 40 CFR 264.177(c)

[Note: The attachment should specify how the Permittee shall comply with §264.177(c) to prevent fires, explosions, etc.]

4. The Permittee must document compliance with III. G. (1) and (2) as required by 40 CFR 264.17(c) and place this documentation in the operating record (condition II. L.1).

[Note: Condition III. G only applies if the facility handles incompatible wastes.]

C.10 →

C.11 →.

MODULE IV - STORAGE IN TANKS

[Note: Inspection requirements (§264.194), closure requirements (§264.197), and waste analysis requirements (§§264.198(a) and 264.199, if necessary) must be covered in Conditions II. E, II. M, and II. C respectively.]

A. Waste Identification. The Permittee may store the following hazardous wastes in tanks, subject to the terms of this permit:

[Note: The permit writer should identify which wastes or classes of wastes the Permittee is allowed to store in tanks. The permit should also specify tank location, wastes allowed in the tank, and construction requirements based on the regulatory requirements of 40 CFR Part 264. For example, the type of waste to be placed in a tank may be based on the compatibility of the tank and the waste. Location may be based on floodplain location, NFPA standards, etc. Construction requirements may be based on the physical properties of the wastes. Parts of the application that address these requirements should be attached. Much of this may be covered by condition IV. B below which requires the tanks to be contructed according to plans.]

B. Design of Tanks. The Permittee shall construct [for new and modified facilities] and maintain all tanks as required by 40 CFR 264.191, as specified in the attached plans and specifications Attachment ~~VI~~ IV. The Permittee shall maintain the minimum shell thickness specified below at all times to ensure sufficient shell strength.

[Note: The minimum shell thickness must be specified in the permit. The attached plans and specifications must demonstrate compliance with §264.191.]

C. General Operating Requirements.

1. The Permittee shall protect tanks from accelerated corrosion, erosion or abrasion as required by 40 CFR 264.192(a), as specified in Attachment IV.

[Note: This condition only applies if wastes or other materials incompatible with the tank are introduced. The Attachment must demonstrate how the facility will comply with §264.192(a).]

(2) The Permittee shall prevent overfilling of tanks, as required by 40 CFR 264.192(b), by the methods specified in Attachment IX.

[Note: The attachment must demonstrate how the facility will comply with §264.192(b).]

D.5.

D. Special Requirements for Ignitable or Reactive Wastes.

1. The Permittee shall not place ignitable or reactive waste in a tank unless the procedures described in Attachment IX are followed, as required by 40 CFR 264.198(a).

[Note: The attachment must demonstrate how the facility will handle ignitable and reactive wastes as required by 40 CFR 264.198(a).]

2. The Permittee shall document compliance with IV. D.1 as required by 40 CFR 264.17(c) and place this documentation in the operating record (condition II. L.1).

3. ~~The Permittee shall maintain buffer zones around covered tanks as specified in Attachment IX, as required by 40 CFR 264. 198(b).~~

3. The Permittee shall maintain buffer zones around covered tanks in accordance with 40 CFR 264.198(b).

[Note: This condition applies only to facilities that store ignitable or reactive hazardous wastes in covered tanks. The attachment must demonstrate compliance with §264.198(b).]

D.6.

E. Special Requirements for Incompatible Wastes.

1. The Permittee shall not place incompatible wastes in the same tank or place hazardous waste in a tank that previously held an incompatible waste or material unless the procedures specified in Attachment IX are followed, as required by 40 CFR 264.17(b).

[Note: The attachment must specify how the Permittee will handle incompatible wastes so as to comply with 40 CFR 264.17(b). If the application does not address this, the permit writer should write specific conditions to implement this provision or should condition the permit so as not to allow this practice.]

2. The Permittee shall document compliance with IV. E.1 as required by 40 CFR 264.17(c) and place this documentation in the operating record (Condition II. L.1).

[Note: Condition IV. D and E only apply to facilities that store igitable and reactive and/or incompatible wastes in tanks.]

Module I

A.3 Duration of Permit

This permit shall be effective for a fixed term not to exceed 10 years.

Module II

B.14 Content of Contingency Plan

The Permittee must have a contingency plan for his facility. The contingency plan must include all information specified in 40 CFR 264.52.

B.18 Emergency Procedures Requirements

Whenever there is an imminent or actual emergency situation, the Permittee's emergency coordinator (or his designee when the emergency coordinator is on call) must immediately effect emergency procedures in accordance with 40 CFR 264.56

B.19 Record of Implementation of Contingency Plan

The Permittee shall record any incident that requires implentation of the contingency plan in the operating record in accordance with 40 CFR 264.56(j). Within 15 days after the incident, the Permittee must submit a written report of the incident to the Regional Administrator in accordance with 40 CFR 264.56(j).

B.24 Closure Plan

The Permittee must have a written closure plan for his facility. The closure plan must include all information specified in 40 CFR 264.112(a).

B.28 Completion of Closure

The Permittee must complete closure activities in accordance with 40 CFR 264.113(b).

Module III

C.1. Container Storage Capacity

The Permittee may store up to 56,000 gallons of hazardous waste in containers.

C.2. Waste Identification

The Permittee may store the following wastes in containers at the facility, subject to the terms of this permit:

F003
F005
U122
D001
D007
D008
D002
D003

The Permittee shall store wastes in containers in compliance with the requirements of 40 CFR Part 264 as specified in the attached plan, Attachment VIII.

C.6. Inspection

The Permittee shall inspect containers and container storage area at least weekly in accordance with 40 CFR 264.174.

C.10 Aisle Space

The Permittee shall maintain adequate aisle space in accordance with 40 CFR 264.35.

C.11. Closure

The Permittee shall close the container storage in accordance with 40 CFR 264.178.

Module IV

D.1. Tank Storage Capacity

The Permittee may store up to 24,000 gallons of hazardous waste in tanks.

D.2. The Permittee may store the following waste in tanks at the facility subject to the terms of this permit:

F003
F005

D.3.

The Permittee shall maintain a minimum shell thickness of 3/16" for all tanks.

SPECIAL TERMS AND CONDITIONS

1. The Permittee shall post signs with the legend "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portions of the facility and at other locations, in sufficient numbers to be seen from any approach to this active portion in compliance with 40 CFR 264.14(c).

2. The Permittee shall not burn any hazardous wastes during cold start of boilers that are classified as hazardous for any reason other than ignitability.

STATEMENT OF BASIS

E.I. duPont deNemours and Company, Inc.
OHD 005-041-843

This is a statement of the basis for the Draft Hazardous Waste Permit for the subject facility. It briefly describes the derivation of the conditions of the draft permit and the reasons for them. Under 40 CFR 124.7 (Title 40 of the Code of Federal Regulations, Section 124.7), the Statement of Basis is sent to the applicant and to any other person who requests it.

A. FACILITY DESCRIPTION

1. RCRA Activities

The Toledo Plant is a wholly owned subsidiary of E.I. duPont deNemours and company. The Toledo facility is primarily a manufacturer of paint and allied products. The hazardous waste facility includes a container storage pad 310 feet by 15 feet, with a capacity of 56,000 gallons, and 10 carbon steel tanks (2 of which have multiple compartments) with an aggregate capacity of 24,000 gallons. Hazardous wastes are stored on-site in containers or tanks prior to recovery or recycling or shipped off-site for disposal. The primary hazardous wastes generated at duPont are spent wash solvents. Spent solvent wastes which are contaminated with metals are recovered on-site. Spent solvent wastes which are not contaminated with heavy metals are burned in industrial steam boilers for fuel value. Various other hazardous wastes are also generated on-site and are shipped off-site for disposal.

2. Permit Actions Other Than RCRA

DuPont is currently in the process of obtaining an air permit for the use of spent solvents as an industrial boiler fuel.

B. PERMIT APPLICATION

The permit application cited herein is the application attached to the Permittee's letter dated August 16, 1982, as modified by subsequent amendments dated December 14, 1982, and May 3, 1983.

C. PURPOSE OF THE PERMITTING PROCESS

The purpose of the permitting process is to afford the United States Environmental Protection Agency (U.S. EPA), interested citizens and other governmental agencies the opportunity to evaluate the ability of the applicant to comply with the applicable hazardous waste management requirements under the Resource Conservation and Recovery Act (RCRA). The U.S. EPA is required to prepare a draft permit which sets forth in one concise document all the applicable requirements with which the Agency intends to require the Permittee to comply during the ten year duration of the permit.

D. PROCEDURES FOR REACHING A FINAL DECISION

Under Section 7004(b) of RCRA and 40 CFR §124.10, the public is given forty-five days to review the application and comment on the draft permit conditions prior to EPA taking any final permitting action on the application for a hazardous waste management permit. The comment period will begin on the date of publication of the public notice in a major local newspaper of general circulation. When the Regional Administrator of the U.S. EPA makes his final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision. If none of the comments received requested a change in the draft permit conditions, the permit will become effective immediately upon issuance of the permit. If comments received during comment period requested changes in the draft permit conditions then the final permit will become effective thirty (30) days after service of notice of the decision or at a later date if review is requested under 40 CFR §124.19.

The issuance of a Hazardous Waste Permit will be coordinated by both U.S. EPA and the Ohio Environmental Protection Agency (OEPA). At this time each Agency has regulations which require a permit to be issued for all facilities which treat, store, or dispose of hazardous waste. If the State receives Phase II interim authorization for the hazardous waste program, the State will assume the administration of the Federal hazardous waste permitting program and this permit.

E. BRIEF SUMMARY OF THE PERMIT CONDITIONS

This Section provides a brief summary of the permit conditions in the draft permit. The column titled "Regulation" provides the regulatory authority for the permit condition specified in the column titled "Permit Condition."

it tion	Subject	Regulation (40 CFR)
I. STANDARD CONDITIONS		
I.A.	Effect of Permit	§270.4 & 270.30(g)
I.B.	Permit Actions	§270.30(f), 270.41, §270.42, 270.43, §264.112 & 264.343(d)
I.C.	Severability	Standard Practice
I.D.1.	Duty to Comply	§270.30(a)
I.D.2.	Duty to Reapply	§270.30(b) & 270.10(h)
I.D.3.	Permit Expiration	§270.51
I.D.4.	Need to Halt or Reduce Activity not a Defense	§270.30(c)
I.D.5.	Duty to Mitigate	§270.30(d)
I.D.6.	Proper Operation and Maintenance	§270.30(e)
...7.	Duty to Provide Information	§270.30(h)& 264.74(a)
I.D.8.	Inspection and Entry	§270.30(i)
I.D.9.	Monitoring and Records	§270.30(j)
I.D.10.	Reporting Planned Changes	§270.30(l)(1)
I.D.11.	Certification of Construction or Modification	§270.30(l)(2)
I.D.12.	Anticipated Noncompliance	§270.30(l)(2)
I.D.13.	Transfer of Permits	§270.30(l)(3), 270.40 & 264.12(c)
I.D.14.	Compliance Schedules	§270.30(l)(5) & 270.33
I.D.15.	Twenty-Four Hour Reporting	§270.30(l)(6) & 264.56 (d)(i)(j)
I.D.16.	Other Noncompliance	§270.30(l)(10)

....17.	Other Information	§270.30(1)(11)
I.E.	Signatory Requirement	§270.11& 270.30(k)
I.F.	Confidential Information	§270.12
I.G.	Documents to be Submitted Prior to Operation	As Indicated in Draft Permit
I.H.	Documents to be Maintained at Facility Site	§264.13(b), 264.16(d) §264.53(a), 264.122(a) §264.142(a), 264.73, §264.15(b)

it tion	Subject	Regulation (40 CFR)
II.	GENERAL FACILITY CONDITIONS	
II.A.	Design and Operation of Facility	§264.31
II.B.	Required Notice	§264.12
II.C.	General Waste Analysis	§264.13
II.D.	Security	§264.14
II.E.	General Inspection Requirements	§264.15
II.F.	Personnel Training	§264.16
II.G.	General Requirements for Ignitable, Reactive and Incompatible Waste	§264.17
II.H.	Location Standards	§264.18
II.I.1.	Required Equipment	§264.32
.2.	Testing and Maintenance of Equipment	§264.33
II.I.3.	Access to Communications or Alarm System	§264.34
II.I.4.	Required Aisle Space	§264.35
II.I.5.	Local Authorities	§264.37
II.J.1.	Implementation of Contingency Plan	§264.51
II.J.2.	Copies of the Contingency Plan	§264.53
II.J.3.	Amendments to the Contingency Plan	§264.54
II.J.4.	Emergency Coordinator	§264.55
II.K.	Manifest System	§264.71, §264.72, §264.76, §270.30(1)(7), §270.30(1)(8)
II.L.1	Operating Record	§264.73
II.L.2.	Biennial Report	§264.75, §270.30(1)(9)

Permit Condition	Subject	Regulation (40 CFR)
II.M.1.	Closure Performance Standard	§264.111
II.M.2.	Amendment to Closure Plan	§264.112(b)
II.M.3.	Notification of Closure	§264.112(c)
II.M.4.	Time Allowed for Closure	§264.113
II.M.5.	Disposal or Decontamination of Equipment	§264.114
II.M.6.	Certification of Closure	§264.115
II.N.	Closure Cost Estimate	§264.142
II.O.	Financial Assurance for Facility Closure	§264.143
II.P.	Liability Requirements	§264.147
II.Q.	Incapacity of Owners or Operators, Generators or Financial Institutions	§264.148

Permit ition	Subject	Regulation (40 CFR)
III.	STORAGE IN CONTAINERS	
III.A.	Waste Identification	§270.13(i)
III.B.	Condition of Containers	§264.171
III.C.	Compatibility of Wastes with Containers	§264.172
III.D.	Management of Containers	§264.173
III.E.	Containment	§264.175
III.F.	Special Requirements for Ignitable or Reactive Waste	§264.176
III.G.	Special Requirements for Incompatible Waste	§264.177

Permit Condition	Subject	Regulation (40 CFR)
IV. STORAGE IN TANKS		
IV.A.	Waste Identification	§270.13(i)
IV.B.	Design of Tanks	§264.191
IV.C.	General Operating Requirements	§264.192
IV.D.	Special Requirements for Ignitable or Reactive Waste	§264.198
IV.E.	Special Requirements for Incompatible Waste	§264.199

Permittee:

E.I. duPont deNemours & Co., Inc.
1930 Tremainsville Road
Toledo, Ohio 43613

I.D. Number: OHD 005-041-843
Permit Number

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations), a permit is issued to E.I. duPont deNemours & Co., Inc. (hereafter called the Permittee), to operate a hazardous waste storage facility located in Toledo, Ohio, on Tremainsville Road, at latitude 41 degrees 41'041" and longitude 83 degrees 35'021".

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264, 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit. (See 40 CFR §270.32(c)).

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated August 16, 1982, as modified by subsequent amendments dated December 14, 1982, and May 3, 1983, (hereafter referred to as the application) is accurate and that the facility will be operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (See 40 CFR §270.41, §270.42 and §270.43) and potential enforcement action. The Permittee must inform EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of
, and shall remain in effect until
, unless revoked and reissued, or terminated (40 CFR §270.41 and .43) or continued in accordance with §270.51.

I. STANDARD CONDITIONS

A. EFFECT OF PERMIT

The Permittee is allowed to store hazardous waste in accordance with the conditions of this permit. Any storage of hazardous waste not authorized in this permit is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606 (a), commonly known as CERCLA), or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, and 270.43. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than non-compliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires.

3. Permit Expiration. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR 270.13 - 270.29) and through no fault of the Permittee the Regional Administrator has not issued a new permit as set forth in 40 CFR 270.51.

4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.

6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.

7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.

8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

   (a) Enter at reasonable times upon the Permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

(d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Records.

(a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 June 1982, or an equivalent method as specified in the attached Waste Analysis Plan, Attachment I.

(b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

(c) Records of monitoring information shall specify:

(i) The dates, exact place, and times of sampling or measurements;

(ii) The individuals who performed the sampling or measurements;

(iii) The dates analyses were performed;

(iv) The individuals who performed the analyses;

(v) The analytical techniques or methods used; and

(vi) The results of such analyses.

10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.

11. Certification of Construction or Modification.

No certification of construction or modification is necessary, as any modifications required by RCRA have already been effected.

12. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR 270.41(b)(2) or 270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.

14. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

5. Twenty-four Hour Reporting. The Permittee shall report to the Regional Administrator any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

(a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.

(b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

(i) Name, address, and telephone number of the owner or operator;

(ii) Name, address, and telephone number of the facility;

(iii) Date, time, and type of incident;

(iv) Name and quantity of materials involved;

(v) The extent of injuries, if any;

(vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

(vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee need not comply with the five day written notice requirement if the Regional Administrator waives the requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances.

16. Other Noncompliance. The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit are submitted. The reports shall contain the information listed in condition I.D.15.

17. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.

E. Signatory Requirement. All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR 270.11.

F. Confidential Information. The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR 270.12.

G. Documents To Be Submitted Prior to Operation.

No documents are required to be submitted prior to operation.

H. Documents To Be Maintained at Facility Site. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

(1) Waste analysis plan as required by 40 CFR 264.13 and this permit.

(2) Inspection schedules as required by 40 CFR 264.15(b) and this permit.

(3) Contingency plan as required by 40 CFR 264.53(a) and this permit.

(4) Closure plan as required by 40 CFR 264.112(a) and this permit.

(5) Cost estimate for facility closure as required by 40 CFR 264.142(d) and this permit.

(6) Operating record as required by 40 CFR 264.73 and this permit.

(7) Personnel training documents and records as required by 40 CFR 264.16(d) and this permit.

II. GENERAL FACILITY CONDITIONS

A. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

B. Required Notice.

(1) The Permittee shall notify the Regional Administrator in writing at least four weeks in advance of the date the Permittee expects to receive hazardous waste from a foreign source. Notice of subsequent shipments of the same waste from the same foreign source in the same calendar year is not required.

(2) When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), he must inform the generator in writing that he has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. (See Condition II.L.1).

C. General Waste Analysis. The Permittee shall follow the procedures described in the attached waste analysis plan, Attachment I.

D. Security. The Permittee shall comply with the security provisions of 40 CFR 264.14(b). The Permittee shall post signs with the legend "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portions of the facility and at other locations, in sufficient numbers to be seen from any approach to this active portion in compliance with 40 CFR 264.14(c).

E. General Inspection Requirements. The Permittee shall follow the inspection schedule, Attachment II. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR 264.15(c). Records of inspections shall be kept as required by 40 CFR 264.15(d).

F. Personnel Training. The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment III. The Permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e).

G. General Requirements for Ignitable, Reactive, or Incompatible Waste. The Permittee shall comply with the requirements of 40 CFR 264.17(a).

H. Location Standards. There are no location standards applicable to this facility.

I. Preparedness and Prevention

1. Required Equipment. At a minimum, the Permittee shall equip the facility with the equipment set forth in the contingency plan, Attachment IV as required by 40 CFR 264.32.

2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition as necessary to assure its proper operation in time of emergency.

3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR 264.34.

4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by 40 CFR 264.35.

5. Arrangements with Local Authorities. The Permittee shall attempt to make arrangements with State and local authorities as required by 40 CFR 264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

J. Contingency Plan.

1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the contingency plan, Attachment IV, and follow the emergency procedures described by 40 CFR 264.56 whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.

2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR 264.53.

3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 40 CFR 264.54.

4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR 264.55, concerning the emergency coordinator.

K. Manifest System. The Permittee shall comply with the manifest requirements of 40 CFR 264.71, 264.72, and 264.76.

. Recordkeeping and Reporting.

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR 264.73(a), (b)(1), (2), (3), (4), (5), (6), (7) and (8).

2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR 264.75.

M. Closure.

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR 264.111 and in accordance with the closure plan, Attachment V.

2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR 264.112(b) whenever necessary.

3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure.

4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittee shall remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment V. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the closure plan, Attachment V.

5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR 264.114 and the closure plan, Attachment V.

6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR 264.115.

. Cost Estimate for Facility Closure. The Permittee's original closure cost estimate, prepared in accordance with 40 CFR 264.142(a), is specified in Attachment V.

1. The Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR 264.142(b).

2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan as required by 40 CFR 264.142(c).

3. The Permittee must keep at the facility the latest closure cost estimate as required by 40 CFR 264.142(d).

O. Financial Assurance for Facility Closure. The Permittee shall demonstrate continuous compliance with 40 CFR 264.143 by providing documentation of financial assurance, as required by 40 CFR 264.151, in at least the amount of the cost estimates required by permit condition II.N. Changes in financial assurance mechanisms must be approved by the Regional Administrator pursuant to 40 CFR 264.143.

. Liability Requirements. The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR 264.147 and the documentation requirements of 40 CFR 264.151, including the requirements to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million, exclusive of legal defense costs.

Q. Incapacity of Owners or Operators, Guarantors, or Financial Institutions.

The Permittee shall comply with 40 CFR 264.148 whenever necessary.

III. STORAGE IN CONTAINERS

A. Waste Identification. The Permittee may store the following wastes in containers at the facility, subject to the terms of this permit:

D001 -- Waste exhibiting the characteristic of ignitability per 40 CFR 261.21

D002 -- Waste exhibiting the characteristic of corrosivity per 40 CFR 261.22

D003 -- Waste exhibiting the characteristic of reactivity per 40 CFR 261.23

D007 -- Waste that is EP-toxic due to chromium

D008 -- Waste that is EP-toxic due to lead

F003 -- Certain spent non-halogenated solvents delineated in 40 CFR 261.31

F005 -- Certain spent non-halogenated solvents delineated in 40 CFR 261.31

U122 -- Commercial grade and/or off-specification Formaldehyde

The Permittee shall store all containerized wastes within the designated storage area. The Permittee shall not, at any one time, store an amount of waste greater than 56,000 gallons within the designated storage area.

B. Condition of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the the conditions of this permit.

C. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR 264.172.

D. Management of Containers. The Permittee shall manage containers as required by 40 CFR 264.173.

E. Containment. The Permittee shall maintain the containment system in accordance with the requirements of 40 CFR 264.175.

F. Special Requirements for Ignitable or Reactive Waste. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facilities property line.

G. Special Requirements for Incompatible Waste. The Permittee shall only store wastes which are mutually compatible.

IV. STORAGE IN TANKS

A. Waste Identification. The Permittee may store the following hazardous wastes in the designated tanks, subject to the terms of this permit:

F003 -- Certain spent non-halogenated solvents delineated in 40 CFR 261.31

F005 -- Certain spent non-halogenated solvents delineated in 40 CFR 261.31

The Permittee shall not store in the designated tanks, at any one time, an aggregate amount of waste greater than 24,000 gallons.

B. Design of Tanks. The Permittee shall maintain all designated tanks as required by 40 CFR 264.191. The Permittee shall maintain sufficient shell strength in all designated tanks to prevent collapse or rupture, including but not limited to maintaining a minimum shell thickness of 0.167" in all designated tanks.

C. General Operating Requirements. The Permittee shall prevent overfilling of tanks, as required by 40 CFR 264.192(b), by the methods specified in Attachment VI.

D. Special Requirements for Ignitable or Reactive Wastes.

1. The Permittee shall not place ignitable waste in any tank unless the procedures described in Attachment VII are followed, as required by 40 CFR 264.198(a). The Permittee shall not store reactive waste in any of the designated tanks.

2. The Permittee shall document compliance with IV. D.1 as required by 40 CFR 264.17(c) and place this documentation in the operating record (condition II. L.1).

3. The Permittee shall maintain buffer zones around covered tanks as required by 40 CFR 264. 198(b).

E. Special Requirements for Incompatible Wastes. The Permittee shall store in the designated tanks only wastes which are mutually compatible.

SIGNATURE PAGE

Signature: _____

Basil G. Constantelos, Director
Waste Management Division

Date: _____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V
HAZARDOUS WASTE MANAGEMENT PERMIT

Name of Permittee: E.I. duPont deNemours & Co., Inc.

Facility Location: 1930 Tremainsville Road, Toledo, Ohio

EPA Identification Number: OHD-005-041-843

Effective Date: September 30, 1983

Expiration Date: September 30, 1993

Authorized Activities

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC., §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (U.S. EPA) codified and to be codified in Title 40 of the Code of Federal Regulations, a permit is issued to E.I. duPont deNemours & Co., Inc., (hereafter called the Permittee), to operate a hazardous waste storage facility located in Toledo, Ohio, at latitude 41 degrees 41'041" and longitude 83 degrees 35'021". You are authorized to conduct the following hazardous waste management activities:

X Storage	___ Treatment	___ Disposal
X Container	___ Tank	___ Injection Well
X Tank	___ Surface Impoundment	___ Landfill
___ Waste Pile	___ Incinerator	___ Land Application
___ Surface Impoundment	___ Other	___ Surface Impoundment

Applicable Regulations:

The conditions of this permit were developed in accordance with the applicable provisions of 40 CFR Part:

X 261	X 264, Subpart G	___ 264, Subpart K
X 262	X 264, Subpart H	___ 264, Subpart L
X 264, Subpart A-E	X 264, Subpart I	___ 264, Subpart O
___ 264, Subpart F	X 264, Subpart J	X 270

Permit Approval:

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit (see 40 CFR §270.32(c)).

This permit is based on the assumption that the information submitted in the final permit application, as amended, (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §270.42 and §270.43) and potential enforcement action. The Permittee must inform U.S. EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

Issued this 30th day of September 1983

by Richard E Bartlett
Basil G. Constantelos, Director
Waste Management Division

I. STANDARD CONDITIONS

✓A. EFFECT OF PERMIT

The Permittee is allowed to store hazardous waste in accordance with the conditions of this permit. Any storage of hazardous waste not authorized in this permit is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local laws or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606 (a), commonly known as CERCLA), or any other law providing for protection of public health or the environment.

✓B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, and 270.43. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

✓C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

✓D. DUTIES AND REQUIREMENTS

✓1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than non-compliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires.

3. Permit Expiration. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR 270.13 - 270.16) and through no fault of the Permittee the Regional Administrator has not issued a new permit as set forth in 40 CFR 270.51.

4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.

6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.

7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.

8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

   (a) Enter at reasonable times upon the Permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

(d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Records.

(a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846, June 1982; Standard Methods for the Examination of Water and Wastewater, 1980; or an equivalent method as specified in the attached Waste Analysis Plan, Attachment I.

(b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

(c) Records of monitoring information shall specify:

(i) The dates, exact place, and times of sampling or measurements;

(ii) The individuals who performed the sampling or measurements;

(iii) The dates analyses were performed;

✓(iv) The individuals who performed the analyses;

✓(v) The analytical techniques or methods used; and

✓(vi) The results of such analyses.

✓10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.

✓11. Certification of Construction or Modification. No certification of construction or modification is necessary, as all modifications required for permit issuance have already been effected.

✓12. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

✓13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR 270.41(b)(2) or 270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.

✓14. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

15. Twenty-four Hour Reporting. The Permittee shall report to the Regional Administrator any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

(a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.

(b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

(i) Name, address, and telephone number of the owner or operator;

(ii) Name, address, and telephone number of the facility;

N/A (iii) Date, time, and type of incident;

(iv) Name and quantity of materials involved;

(v) The extent of injuries, if any;

(vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

(vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee need not comply with the five day written notice requirement if the Regional Administrator waives the requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances.

16. Other Noncompliance. The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in condition I.D.15.

17. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.

E. Signatory Requirement. All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR 270.11.

F. Confidential Information. The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR 270.12.

G. Documents To Be Submitted Prior to Operation. No documents are required to be submitted prior to operation.

H. Documents To Be Maintained at Facility Site. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

(1) Waste analysis plan as required by 40 CFR 264.13 and this permit.

(2) Personnel training documents and records as required by 40 CFR 264.16(d) and this permit.

(3) Contingency plan as required by 40 CFR 264.53(a) and this permit.

(4) Closure plan as required by 40 CFR 264.112(a) and this permit.

(5) Cost estimate for facility closure as required by 40 CFR 264.142(d) and this permit.

(6) Operating record as required by 40 CFR 264.73 and this permit.

(7) Inspection schedules as required by 40 CFR 264.15(b) and this permit.

II. GENERAL FACILITY CONDITIONS

A. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could treaten human health or the environment.

B. Required Notice.

(1) The Permittee shall notify the Regional Administrator in writing at least four weeks in advance of the date the permittee expects to receive hazardous waste from a foreign source. Notice of subsequent shipments of the same waste from the same foreign source in the same calendar year is not required.

(2) When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), he must inform the generator in writing that he has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. (See Condition II.K.1).

C. General Waste Analysis. The Permittee shall follow the procedures described in the attached waste analysis plan, Attachment I.

D. Security. The Permittee shall comply with the security provisions of 40 CFR 264.14(b) and (c).

E. General Inspection Requirements. The Permittee shall follow the inspection schedule, Attachment II. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR 264.15(c). Records of inspections shall be kept as required by 40 CFR 264.15(d).

F. Personnel Training. The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment III. The Permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e).

G. General Requirements for Ignitable, Reactive, or Incompatible Waste. The Permittee shall comply with the requirements of 40 CFR 264.17(a), except that "No Smoking" signs need not be posted, since company operating procedures preclude workers or visitors from carrying smoking materials in waste handling areas.

H. Location Standards. There are no location standards applicable to this facility.

I. Preparedness and Prevention

1. Required Equipment. At a minimum, the Permittee shall equip the facility with the equipment set forth in the contingency plan, Attachment IV, as required by 40 CFR 264.32.

2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition as necessary to assure its proper operation in time of emergency.

3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR 264.34.

4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by 40 CFR 264.35.

5. Arrangements with Local Authorities. The Permittee shall attempt to make arrangements with State and local authorities as required by 40 CFR 264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

(Check Att)

J. Contingency Plan.

1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the contingency plan, Attachment IV, and follow the emergency procedures described by 40 CFR 264.56 whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.

2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR 264.53.

3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 40 CFR 264.54.

Check Att. for Emer Coor.

4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR 264.55, concerning the emergency coordinator.

K. Manifest System. The Permittee shall comply with the manifest requirements of 40 CFR 264.71, 264.72, and 264.76.

L. Recordkeeping and Reporting.

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR 264.73(a), (b)(1), (2), (3), (4), (5), (6), (7) and (8).

2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR 264.75.

M. Closure.

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR 264.111 and in accordance with the closure plan, Attachment V.

2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR 264.112(b) whenever necessary.

3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure.

4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment V. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the closure plan, Attachment V.

5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR 264.114 and the closure plan, Attachment V.

6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR 264.115.

N. Cost Estimate for Facility Closure. The Permittee's original closure cost estimate, prepared in accordance with 40 CFR 264.142(a), is specified in Attachment V.

1. The Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR 264.142(b).

2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan as required by 40 CFR 264.142(c).

3. The Permittee must keep at the facility the latest closure cost estimate as required by 40 CFR 264.142(d).

O. Financial Assurance for Facility Closure. The Permittee shall demonstrate continuous compliance with 40 CFR 264.143 by providing documentation of financial assurance, as required by 40 CFR 264.151, in at least the amount of the cost estimates required by permit condition II.N. Changes in financial assurance mechanisms must be approved by the Regional Administrator pursuant to 40 CFR 264.143.

P. Liability Requirements. The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR 264.147 and the documentation requirements of 40 CFR 264.151, including the requirement to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million, exclusive of legal defense costs.

Q. Incapacity of Owners or Operators, Guarantors, or Financial Institutions.

The Permittee shall comply with 40 CFR 264.148 whenever necessary.

III. STORAGE IN CONTAINERS

A. Waste Identification. The Permittee may store the following wastes in containers at the facility, subject to the terms of this permit:

D001 -- Waste exhibiting the characteristic of ignitability per 40 CFR 261.21

D002 -- Waste exhibiting the characteristic of corrosivity per 40 CFR 261.22

D003 -- Waste exhibiting the characteristic of reactivity per 40 CFR 261.23

D007 -- Waste that is EP-toxic due to chromium

D008 -- Waste that is EP-toxic due to lead

F003 -- Certain spent non-halogenated solvents delineated in 40 CFR 261.31.

F005 -- Certain spent non-halogenated solvents delineated in 40 CFR 261.31.

U122 -- Commercial grade and/or off-specification Formaldehyde

The Permittee shall store all containerized waste within the storage area identified in the permit application. The Permittee shall not, at any one time, store an amount of waste greater than 56,000 gallons within the identified storage area.

B. Condition of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the the conditions of this permit.

C. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR 264.172.

D. Management of Containers. The Permittee shall manage containers as required by 40 CFR 264.173.

E. Containment. The Permittee shall operate and maintain the containment system is accordance with the requirements of 40 CFR 264.175, and as specified in the secondary containment procedures, Attachment VIII.

F. Special Requirements for Ignitable or Reactive Waste. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.

G. Special Requirements for Incompatible Waste. The Permittee shall only store wastes which are mutually compatible.

IV. STORAGE IN TANKS

A. Waste Identification. The Permittee may store the following hazardous wastes in the waste storage tanks identified in the permit application, subject to the terms of this permit:

F003 -- Certain spent non-halogenated solvents delineated in 40 CFR 261.31

F005 -- Certain spent non-halogenated solvents delineated in 40 CFR 261.31

The Permittee shall not store in the identified tanks, at any one time, an aggregate amount of waste greater than 24,000 gallons.

B. Design of Tanks. The Permittee shall maintain all identified tanks as required by 40 CFR 264.191. The Permittee shall maintain sufficient shell strength in all identified tanks to prevent collapse or rupture, including but not limited to maintaining a minimum shell thickness of 0.167" in all identified tanks.

C. General Operating Requirements. The Permittee shall prevent overfilling of the identified tanks, as required by 40 CFR 264.192(b), by the methods specified in Attachment VI.

D. Special Requirements for Ignitable or Reactive Wastes.

1. The Permittee shall not place ignitable waste in any identified tank unless the procedures described in Attachment VII are followed, as required by 40 CFR 264.198(a). The Permittee shall not store reactive waste in any of the identified tanks.

2. The Permittee shall document compliance with IV. D.1 as required by 40 CFR 264.17(c) and place this documentation in the operating record (condition II. L.1).

3. The Permittee shall maintain buffer zones around any identified tanks as required by 40 CFR 264. 198(b).

E. Special Requirements for Incompatible Wastes. The Permittee shall store in the identified tanks only wastes which are mutually compatible.

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT I
WASTE ANALYSIS PLAN

E.I. duPont deNemours, Inc.
U.S. EPA FACILITY ID #: OHD-005-041-843

C. WASTE CHARACTERISTICS

C-1. CHEMICAL AND PHYSICAL ANALYSIS

RCRA REGULATIONS REQUIRE EACH HW GENERATOR (SECTION 262.11) TO MAKE A DETERMINATION OF THE APPLICABILITY OF THOSE REGULATIONS TO EACH WASTE STREAM IN THIS MANNER:

1. DETERMINE IF IT IS A SOLID WASTE AS DEFINED IN SECTIONS 261.2.
2. IF IT IS A SOLID WASTE, THEN DETERMINE IF IT IS HAZARDOUS WASTE BY THIS PROCEDURE IN SECTION 262.11:
   A. DETERMINE IF THE WASTE IS EXCLUDED UNDER SECTIONS 261.4 AND 261.5 OR EXEMPTED UNDER SECTION 261.6(A).
   B. IF NOT, HE MUST DETERMINE IF IT IS A LISTED WASTE IN SUBPART D OF 40 CFR 261.
   C. IF NOT, HE MUST FINALLY DETERMINE IF THE WASTE IS IDENTIFIED AS A HAZARDOUS WASTE UNDER SUBPART C OF 40 CFR 261 BY EITHER (EMPHASIS ADDED):
      (1) TESTING FOR THE FOUR CHARACTERISTICS OF SUBPART C, OR
      (2) "APPLYING KNOWLEDGE OF THE HAZARD CHARACTERISTICS IN LIGHT OF THE MATERIALS OR THE PROCESSES USED."

AS ALL WASTES FOR THIS STORAGE FACILITY ARE GENERATED EITHER ON THE SITE BY WELL KNOWN PROCESSES AND FORMULAS OR BY ALMOST IDENTICAL PROCESSES ON OTHER SITES UNDER THE SAME DEPARTMENT MANAGEMENT AND ENVIRONMENTAL PROTECTION PROGRAM, OUR TECHNICAL STAFF KNOWS ENOUGH ABOUT THESE WASTE STREAMS TO

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US TO IDENTIFY ALMOST ALL OF THE SOLVENT-BASED LIQUID PAINT WASTE STREAMS TO BE IGNITABLE AND, THEREFORE, HAZARDOUS WASTES.

ONCE THE WASTE IS IDENTIFIED AS HAZARDOUS BY EITHER LISTING OR DETERMINATION FROM COMPOSITION, NO FURTHER TESTING IS REQUIRED BY RCRA. THEREFORE, THERE ARE NO CHEMICAL ANALYSES INCLUDED IN THIS PERMIT APPLICATION. MANAGING THE WASTE AS IGNITABLE--AS WE DO ALL OUR RAW MATERIALS, INTERMEDIATES AND FINISHED PRODUCTS--CAN BE ACCOMPLISHED SUCCESSFULLY WITHOUT FURTHER DETAILED KNOWLEDGE THAT UNNECESSARY AND EXPENSIVE TESTING WOULD PROVIDE ON A GIVEN SAMPLE. HOWEVER, REMEMBERING THAT THE WASTES COME FROM A VARIABLE MIX OF THOUSANDS OF INDIVIDUAL FORMULAS, NO SAMPLING FREQUENCY (SHORT OF 100 PERCENT) WOULD BE SATISFACTORY TO ANALYSE FOR PRECISE CONTENT.

THE OWNER OR OPERATOR OF A STORAGE FACILITY MUST HAVE A DETAILED CHEMICAL AND PHYSICAL ANALYSIS OF THE WASTE STREAMS HE STORES. "AT A MINIMUM, THIS ANALYSIS MUST CONTAIN ALL THE INFORMATION WHICH MUST BE KNOWN TO (TREAT,) STORE (,OR DISPOSE OF) THE WASTE IN ACCORDANCE WITH THE REQUIREMENTS OF THIS PART..."--FROM SECTION 264.13(A)(1). "THE ANALYSIS MAY INCLUDE DATA DEVELOPED UNDER PART 261 OF THIS CHAPTER...."--FROM SECTION 264.13(A)(2). [redacted]

A COMPLETE SET OF CURRENT WASTE CHARACTERIZATION FORMS (WCF'S) FOR THE SITE (AND THE TWO WASTE STREAMS FROM OFF-SITE F&FP PLANTS) IS ATTACHED. SOME OF THESE WASTE STREAMS DO NOT FIT ANY RCRA CRITERIA BUT ARE DEEMED HAZARDOUS ENOUGH FROM AN INDUSTRIAL

HYGIENE BASIS OR FROM OTHER REGULATION (E.G., ASBESTOS) TO WARRANT SENDING THEM TO SECURE CHEMICAL LANDFILLS. SOME OTHER OF THESE WCF'S ARE PART OF A DISPOSAL CONTRACT JUST IN CASE THEY ARE SUDDENLY GENERATED (I.E., "WOT-8, UNREACTED/PARTIAL REACTED MONOMERS." WHICH REPRESENTS A RESIN BATCH WHICH DID NOT PROPERLY REACT).

NO CORROSIVE WASTE EXISTS ON THE PLANT PRESENTLY OR IS PLANNED IN THE FUTURE. IF A CORROSIVE WASTE IS GENERATED, ITS PH WOULD BE APPROXIMATELY 12.5. REACTIVE WASTES ARE INHIBITED WITH A SPECIAL SOLUTION TO PREVENT AN EXOTHERMIC POLYMERIZATION REACTION BEFORE THE MATERIAL IS INCINERATED.

C-2. WASTE ANALYSIS PLAN

THE FOLLOWING PLAN FOR [redacted] EMBODIES THE DEVELOPMENT OF THE WASTE CHARACTERISTIC FORMS (SEE SECTION C-1) AND DETERMINING, BY KNOWLEDGE OF THE INGREDIENTS AND PROCESSES, WHETHER A PARTICULAR WASTE STREAM IS A RCRA WASTE OR NOT. THE STEPS OUTLINED IN C-2 A THROUGH D BELOW ADDRESS THE SECTION 264.13(B) REQUIREMENTS. C-2E ADDRESSES THE SPENT SOLVENT BROUGHT FROM OTHER F&FP PLANTS.

C-2A. PARAMETERS AND RATIONALE

THE PRIMARY HAZARD CHARACTERISTIC OF SOLVENT-BASED PAINT PRODUCTS IS IGNITABILITY. THERE ARE NO ACUTELY TOXIC, IMMEDIATE EFFECTS FROM CONTACT WITH PAINT WASTE. THERE CAN BE SOME EFFECT FROM INHALING TOO HIGH A CONCENTRATION OF SOLVENT VAPORS (LACK OF ADEQUATE VENTILATION) BUT THIS IS NOT AN EXPECTED CONDITION IN CLOSED, WELL-VENTILATED OR OUT-OF-DOORS STORAGE FACILITIES. IN

TERMS OF LONGER TERM IMPACT OF PAINT WASTE ON THE ENVIRONMENT. HEAVY METAL CONTENT--PRIMARILY LEAD AND CHROMIUM (+6)--AND LIQUID ORGANICS MUST BE CONSIDERED, NOT FOR STORAGE BUT FOR CHOOSING A DISPOSAL METHOD. THUS, THE PRIMARY PARAMETERS TO CONSIDER ARE:

- FLASH POINT
- LEAD/CHROMATE CONTENT
- PHYSICAL STATE, I.E., LIQUID OR NOT OTHER ITEMS TO BE CONSIDERED ARE INDICATED ON THE WASTE CHARACTERIZATION FORM (WCF) AS DESCRIBED IN SECTION C-1.

C-23. IESI METHODS

AS OUTLINED IN C-1, ALL OUR WASTES ARE SELF-GENERATED AND CHARACTERIZED FROM KNOWN PROCESSES AND FORMULATIONS. MOST ARE A COMPOSITE OF TENS OR HUNDREDS OF FINISHED PRODUCT CODES—BUT EXHIBITING A COMMON HAZARD DENOMINATOR, IGNITABILITY. THE CHARACTERIZING PROCEDURE IS AS FOLLOWS:

1. A WASTE STREAM IS DEFINED BY THE SOLID WASTE COORDINATOR (SEE C-3, SAMPLING METHOD).
2. A CHEMIST OR ENGINEER FAMILIAR WITH THE GENERATING PROCESS DETERMINES THE PRODUCT(S) THAT WOULD BE PRESENT, AND USING HIS/HER KNOWLEDGE AND THE FORMULA FILE, COMPUTES THE AVERAGE CONCENTRATION RANGE FOR MAJOR INGREDIENTS AND INDICATES TRACE ITEMS.
3. THEN OTHER DATA ON PHYSICAL STATE, HAZARD DESIGNATIONS, SAFETY CONSIDERATIONS, ETC., ARE INDICATED.
4. ADDITIONAL DESCRIPTIONS AND/OR HAZARD WARNING

INFORMATION MAY BE APPENDED.

5. THE SITE DOT COORDINATOR IS THEN CONSULTED TO SELECT PROPER CONTAINERS AND DOT SHIPPING NAME, CLASS, NUMBER, ETC.

6. A REVIEW BY THE SOLID WASTE COORDINATOR COMPLETES THE PROCESS.

IT SHOULD BE NOTED THAT THIS REVIEW CAN RESULT IN A WASTE BEING FOUND NOT A RCRA HAZARD WASTE. IF THERE IS ANY DOUBT, FLASH POINTS MIGHT BE RUN USING THE SETAFLASH CLOSED CUP TESTER AND ASTM D-3278-78 STANDARD IN THE PLANT LABORATORY. IF NECESSARY, THE EXTRACTION PROCEDURE TOXICITY TEST, AS DETAILED IN 40 CFR 261.24 AT 45 FR 33122 ET SEQ (MAY 19, 1980), IS RUN BY THE F&FP DEPARTMENT'S PROCESS ENGINEERING GROUP AT THE MARSHALL LABORATORY, PHILADELPHIA.

SHOULD A TOTALLY UNKNOWN WASTE BE FOUND ON THE SITE (BY OPERATOR ERROR, MISLABELING, ETC.), THE PLANT LABORATORY HAS GAS CHROMATOGRAPHY CAPABILITY TO IDENTIFY SOLVENTS. AS MENTIONED IN C-1, THIS CHARACTERIZING PROCESS IS APPLIED TO POSSIBLE WASTE STREAMS TO BE PREPARED FOR UNEXPECTED, ONE-TIME WASTE STREAMS THAT REQUIRE PROMPT INCINERATION. THE WCF IS MADE PART OF A CONTRACT FOR THIS EVENTUALITY WITH A RCRA INCINERATOR OPERATOR.

C-2C. SAMPLING METHODS

DETERMINATION OF UNIQUE WASTE STREAMS IN THE PLANT IS DONE BY THE SOLID WASTE COORDINATOR AND AREA SUPERVISORS. WHENEVER THE GENERATING AREA HAS A NEW WASTE STREAM, IT IS REVIEWED FOR FIT TO EXISTING WCF'S; IF NOT, A NEW WCF IS PREPARED (SEE C-2B). AS DISCUSSED ABOVE, THERE IS NORMALLY NO SAMPLING

NEEDED TO EFFECTIVELY CHARACTERIZE THE WASTE STREAM.

IF A DRUM OF WASTE IS UNKNOWN, IT WOULD BE THOROUGHLY AGITATED (INTERNAL AGITATION BLADE OR DRUM TUMBLER) FOR 4-8 HOURS. A PINT SAMPLE WOULD THEN BE POURED FROM THE DRUM FOR LABORATORY ANALYSIS.

C-2D. FREQUENCY OF ANALYSES

WCF'S ARE PREPARED WHENEVER A NEW WASTE STREAM IS ENCOUNTERED (OR ANTICIPATED). SINCE MOST OF THESE ARE PART OF AN OFF-SITE WASTE DISPOSAL CONTRACT, THEY ARE REVIEWED EACH TIME A CONTRACT IS RENEWED. SIGNIFICANT CHANGES IN PROCESS OR PRODUCT MIX ARE CAUSE FOR REVIEW OF THE AFFECTED WCF'S. THE WCF'S ARE REVIEWED AT LEAST ONCE A YEAR.

D. PROCESS INFORMATION

THE STORAGE FACILITIES AT THIS SITE INVOLVE ONLY CONTAINERS AND TANKS. NO WASTE PILES, IMPOUNDMENTS, INCINERATORS, LANDFILLS OR OTHER TREATMENT/DISPOSAL OPERATIONS ARE PRESENT. THUS, THIS SECTION WILL CONSIST ONLY OF D-1 AND D-2.

D-1. CONTAINERS

D-1A. CONTAINERS WITH FREE LIQUIDS

ONLY WCF'S NOS. WOT-1, 3, 5, & 15 ARE CLASSIFIED A HAVING NO FREE LIQUIDS. ALL OTHERS ARE IN THIS CATEGORY, INCLUDING THOSE SPENT SOLVENTS NORMALLY KEPT IN TANKS BUT OCCASIONALLY TEMPORARILY KEPT IN DRUMS (PRIOR TO PUMPING INTO THE TANK SYSTEM).

D-1A(1). DESCRIPTION OF CONTAINERS

THE CONTAINERS USED FOR THE HW STORAGE FACILITY'S PRIMARY CONTAINMENT ARE ALL DOT-APPROVED SHIPPING CONTAINERS FOR

mix are cause for review of the affected WCF's. The WCF's are reviewed at least once a year.

C-2e. Additional Requirements for Wastes Generated Offsite

The spent solvent waste streams from the other F&FP plants (discussed in B-1) must be characterized by the same procedure as describe in C-1 and C-2a to d. Current copies of these WCF's are part of the Toledo plant Waste Analysis Plan (see C-1).

In addition, drums of these spent solvents must have a special waste identifying label applied with the Chicago WCF number on it (WOC-6-DS). Tank wagon shipments will have the Flint WCF number (WOF-15-LM2) plainly indicated on the shipping papers.

Upon arrival at Toledo, drums are checked for the WCF label and one drum in twelve is sampled and observed for physical characteristics that match those on the WCF. Included would be:

- Characteristic solvent odor
- Lack of pigmentation (for fuel recovery solvents)
- Lack of water contamination
- Low viscosity (pumpability)

Likewise, a sample would be taken from each tank wagon for the same examination.

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT II
INSPECTION SCHEDULE

E.I. duPont deNemours, Inc.
U.S. EPA FACILITY ID #: OHD-005-041-843

THE NATURE OF OUR WASTE AND SECURE CONTAINMENT IN DRUMS AND TANKS (PLUS THE ADDED PERIMETER SECURITY SYSTEM) DEMONSTRATES THAT THERE IS NO INJURY POTENTIAL TO OUTSIDE PERSONS AND THAT THEY WOULD NOT BE ABLE TO CAUSE PERMIT VIOLATIONS AS IS SPECIFIED IN SECTION 264.14(A)(1) AND (2). THUS, THE WARNING SIGNS DESCRIBED IN SECTION 264.14(C) ARE NOT REQUIRED AND A WAIVER IS REQUESTED.

E-2. INSPECTION SCHEDULE

A WRITTEN INSPECTION SCHEDULE IS KEPT AND MAINTAINED AT THE FACILITY FOR WEEKLY INSPECTION OF DRUMS STORED TO CLOSE, DIKES AND PAD FOR CRACKS AND WET SPOTS, CONTAINER LABELING, RAMPS FOR DAMAGE, TANK INSPECTIONS FOR STRUCTURAL SUPPORTS AND DIKES, LOADING AND UNLOADING AREAS, AND ANY OTHER WASTE HANDLING AREAS. ALSO TANK OVERFILLING EQUIPMENT WILL BE INSPECTED DAILY.

SAFETY EQUIPMENT AND THEIR FREQUENCY OF INSPECTION IS SHOWN BELOW:

SAFETY EQUIPMENT	INSPECTION FREQUENCY
FIRE EXTINGUISHERS	MONTHLY
SAFETY SHOWERS	WEEKLY
EYEWASH STATIONS	WEEKLY
SCOTT AIR PACKS	MONTHLY
FIRE DOORS	MONTHLY
RELIEF VALVES	QUARTERLY
FIRE ALARM SYSTEM	WEEKLY
SPILL LOCKERS	MONTHLY
FENCE LINE	MONTHLY
EMERGENCY RESPONSE KIT	MONTHLY

PLANT FIRE TRUCK	WEEKLY
FIRE HOSES	MONTHLY
FIRE BOXES	MONTHLY
FIRE CANNONS	MONTHLY
FIRE PUMP	WEEKLY
SPRINKLER LINES	EVERY 5 YEARS

F-2A. GENERAL INSPECTION REQUIREMENTS

THE INSPECTION AT THE SITE FALL INTO THREE CATEGORIES:

- DRUM PAD
- TANKS
- EMERGENCY EQUIPMENT

THE EMERGENCY EQUIPMENT INSPECTION SCHEDULE PRE-DATES RCRA AND IS DOCUMENTED IN PLANT PROCEDURE #44. THE COMPLETE INSPECTION PLAN (INCLUDING PROCEDURE #44) IS INCLUDED AT THE END OF THIS SECTION (F-2). FIRE EQUIPMENT INSPECTION IS ALSO DETAILED IN SECTIONS B-9E & C OF THE PREPAREDNESS AND PREVENTION PLAN (PPP). THE PPP IS PART OF THE CONTINGENCY PLAN - SECTION G.

F-2A(1). TYPES OF PROBLEMS

THE TYPES OF PROBLEMS TO BE CHECKED ARE OUTLINED IN SECTION C OF THE INSPECTION PLAN.

F-2A(2). FREQUENCY OF INSPECTION

THE INSPECTION FREQUENCY FOR THE DRUM PAD AND TANKS IS WEEKLY (SEE INSPECTION PLAN - SECTION B). THE INSPECTION OF SAFETY ITEMS IS INDICATED IN PROCEDURE #44 AND THE PLANT'S COMPUTERIZED INSPECTION/TICKLER SCHEDULE (SAMPLE ATTACHED TO PROCEDURE #44).

THE TANKS ARE IN OPERATING AREAS WHERE MANY OPERATORS AND SUPERVISORS OBSERVE THEM AROUND THE CLOCK WHEN THE PLANT IS OPERATING. THE GUARDS MAKE ROUNDS DURING SHUTDOWNS TO LOOK FOR ABNORMAL CONDITIONS (LEAKS, ETC.). THE PRESENCE OF THESE EMPLOYEES IS A SECONDARY, INFORMAL, DAILY INSPECTION WHICH REINFORCES THE FORMAL, WEEKLY INSPECTION.

F-23. SPECIFIC PROCESS INSPECTION REQUIREMENTS

F-23(1). CONTAINER INSPECTION

THE WEEKLY INSPECTION OF THE CONTAINERS IN STORAGE IS DOCUMENTED ON THE INSPECTION LOG FORM AS OUTLINED IN SECTION D OF THE INSPECTION PLAN.

F-23(2). TANK INSPECTION

AS OUTLINED IN SECTIONS C-2 OF THE INSPECTION PLAN, WEEKLY INSPECTIONS ARE LOGGED FOR THE TANKS (AS A GROUP). SINCE THE TANKS HAVE EMPLOYEE ATTENDANCE AND SURVEILLANCE WHEN IN USE, AS DESCRIBED IN F-2A(2) ABOVE, NO FORMAL LOG IS KEPT OF THESE DAILY OBSERVATIONS.

F-23(2)(A). TANK CONSTRUCTION MATERIALS

THE TANKS ARE ALL CARBON STEEL, WHICH IS NOT CORRODED BY THE ORGANICS CONTAINED IN THEM (SEE SECTION B-1 AND D-2 ABOVE). ALL TANKS ARE COMPLETELY ABOVE GROUND (MOST ARE INSIDE) AND ARE CHECKED FOR DETERIORATION AND LEAKS WEEKLY PER THE INSPECTION PLAN (SECTIONS B AND C2).

F-23(2)(B). TANK SURROUNDING AREA

THE INSPECTION REFERENCED IN THE PREVIOUS PARAGRAPH INCLUDES THE SURROUNDING AREA.

F-23(2)(C). TANK OVERFILLING CONTROL EQUIPMENT

THE TANKS HAVE LEVEL GAGES AND/OR HIGH LEVEL ALARMS WHICH ARE OBSERVED DAILY WHEN THE EQUIPMENT IS IN OPERATION (SEE E-2A(2)). NO DANGER EXISTS TO HUMANS OR THE ENVIRONMENT, EXCEPT IGNITION (SEE B-1), EVEN IF THE LEVEL EQUIPMENT SHOULD ALLOW OVERFLOW SOME SPENT SOLVENT. OUR SPILL PLAN AND NORMAL PRACTICES WOULD MORE THAN ADEQUATELY COPE WITH THIS DANGER POTENTIAL.

INSPECTION OF THE LEVEL CONTROLS/DEVICES BY OPERATING PERSONNEL IS DONE EVERY DAY.

E-23(2)(D). TANK MONITORING DATA

OUR TANKS HAVE NO OTHER MONITORING EQUIPMENT. THEREFORE, NO DATA ARE TAKEN. ALL TANKS ARE GROUNDED AND VENTED TO THE ATMOSPHERE VIA FLAME ARRESTOR/CONSERVATION VENTS.

E-23(2)(E). TANK LEVEL OF WASTE

THIS REQUIREMENT FOR UNCOVERED TANKS IS NOT APPLICABLE TO OUR CLOSED TANKS.

E-23(2)(F). TANK CONDITION ASSESSMENT

VISUAL INSPECTION DURING OPERATION AND AT THE TIME OF REPAINTING--COUPLED WITH A LACK OF LEAKS--WILL SUFFICE TO ASSESS THESE TANKS AS IN GOOD CONDITION. SHOULD INDICATION OF EXTERNAL CORROSION OR LEAKAGE BE UNCOVERED BY OPERATOR OR MECHANICS, A THOROUGH ASSESSMENT OF THE TANK'S CONDITION WOULD BE MADE (EMPTY, CLEAN, EXAMINE INSIDE AND OUT, HYDROSTATIC TEST AND, IF NCESSARY, AN EVALUATION OF METAL THICKNESS).

E-23(2)(G). TANK INTERIM INSPECTION

SINCE THERE IS LITTLE OR NO MOTION IN THESE TANKS, NO EROSION IS ANTICIPATED. THE SPENT SOLVENTS ARE NOT CORROSIVE TO THE TANKS AND NO INTERIOR DETERIORATION IS ANTICIPATED. THE SOLVENT LIQUID AND SATURATED VAPOR EFFECTIVELY PREVENT ANY RUSTING OF THE INTERIORS FROM AMBIENT AIR MOISTURE. THESE ASSUMPTIONS HAVE BEEN BORNE OUT BY YEARS OF USE OF THIS CONSTRUCTION TANKS FOR RAW MATERIAL, INTERMEDIATE AND FINISHED PRODUCT STORAGE IN SOLVENT-BASED PAINT PRODUCTION.

E-2C. REMEDIAL ACTION

THE ACTION TO BE TAKEN FOR SPECIFIC CONDITIONS FOUND DURING FORMAL INSPECTION OR EMPLOYEE OBSERVATIONS ARE OUTLINED IN SECTION D-4 OF THE INSPECTION PLAN.

E-2D. INSPECTION LOG

A BLANK OF EACH INSPECTION LOG IS INCLUDED IN THE INSPECTION PLAN. A SAMPLE OF ONE PAGE OF A LOG IS ATTACHED. THE BALANCE OF THE LOGS ARE ON FILE AT THE SITE AND ARE MAINTAINED FOR THREE YEARS (SEE SECTION D-3 OF THE INSPECTION PLAN).

E-3. WAIVER OF PREPAREDNESS AND PREVENTION REQUIREMENTS

NO WAIVER IS SOUGHT SINCE THE PLANT SITE FACILITIES ARE ADEQUATE TO MEET ANY SITUATION RESULTING FROM THE STORAGE OF IGNITABLE HW AND DO MEET THE STATUATORY REQUIREMENTS OF 40 CFR 264.32.

E-3A. EQUIPMENT REQUIREMENTS

THE SITE MEETS ALL OF THE REQUIREMENTS BELOW:

E-3A(1). INTERNAL COMMUNICATION

THE PLANT HAS A 14-BOX GAMEWELL DOUBLE LOOP, FIRE ALARM SYSTEM, WITH SITE-WIDE, CLEARLY AUDIBLE HORN/BELL SIGNALS. WHEN ACTIVATED, THE SYSTEM RINGS THE LOCATION CODE OF THE BOX PULLED. THE PLANT SUPERVISORY AND MANAGEMENT PERSONNEL REGULARLY USES A RADIO SYSTEM CONSISTING OF:

- A BASE STATION AT THE GUARD HOUSE
- 19 HAND-HELD TWO-WAY RADIOS WHICH CAN CALL EACH OTHER AND THE BASE STATION.
- 22 PAGERS WHICH CAN ONLY RECEIVE A VERBAL MESSAGE FROM THE BASE STATION.

V. INSPECTION PLAN

A. General

1. 40 CFR 265.15 requires an inspection plan to provide early detection and correction of hazardous waste leaks and to insure emergency equipment is operating properly.

2. This plan is intended to insure that: (1) all storage containers and tanks remain in good condition; (2) any damaged or leaking HW containers are promptly re-containerized (3) any HW leaks from tanks are promptly detected and stopped; (4) Any spill of HW in storage areas is promptly cleaned up; and (5) all safety and emergency equipment is in good operating condition.

3. This plan is no different than existing policy and practice except the formal log and record keeping for the storage areas.

4. Management of the facility will have the responsibility to audit the performance of assigned inspectors by checking the log keeping and spot checking the storage areas weekly.

B. Frequency

1. 40 CFR 265.14 specifies weekly inspection for HW containers and tanks.

2. The best time for storage area inspection would be early in the week after the facility has been closed for the weekend.

3. All containers and tanks should be checked immediately following a materials handling accident or major container failure.

4. The safety equipment is inspected in accordance with Procedure #44 and the computerized inspection/tickler system (weekly, monthly, quarterly, etc.)

C. Items to be Checked

1. Drum Pad

   a. Leaks or evidence of significant deterioration of containers
   b. Evidence of physical damage (such as fork truck impact).

2. Tanks

   a. Leaks or evidence of significant deterioration of tanks
   b. Leaks from piping in system
   c. Evidence of over-flow (on tank sides)
   d. Condition and function of level gages and any other instrumentation
   e. Surrounding area for evidence of leaks

3. Safety Equipment

   a. Evidence of physical damage
   b. Other parameters per Operating Procedure #44.

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V. INSPECTION PLAN (continued

D. Logs

1. An inspection log shall be maintained for each separate storage area -- as designated on Form 3, page 5 of the facilities Part A (Interim Status) permit application.

2. Format of the inspection log is attached. (Same format used for container storage area and tanks.)

3. All logs are numbered sequentially and kept on file for at least three years after the inspection date (normally a year's worth will be disposed of at a time -- 3 years after the facility prepares its annual report in January to cover that year's inspection).

4. It is essential that:

   a. The weekly schedule be adhered to

   b. Any discrepancies be noted and corrective action noted (date when done)

      - o Leaking bungs need new gaskets.
      - o Leaking open-heads need new top gaskets.
      - o Leaking or badly damaged drums require re-drumming.
      - o Leaking tanks, pipes, etc. require immediate maintenance attention to prevent ignition of vapors.

   c. The absence of any leaks, etc., be noted under "Observations" as None.

OHD005041843

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HAZARDOUS WASTE STORAGE/TREATMENT FACILITY

INSPECTION LOG

FACILITY DESCRIPTION : ____________________

DATE	TIME	INSPECTOR'S NAME	OBSERVATION	REMEDIAL ACTION

OHD005041243

SAMPLE LOG

HAZARDOUS WASTE STORAGE/TREATMENT FACILITY

INSPECTION LOG

FACILITY DESCRIPTION : Drum storage

DATE	TIME	INSPECTOR'S NAME	OBSERVATION	REMEDIAL ACTION
5/3/82	AM	H. L. Dunn	No Problem observed	NONE
5/10	"	"	"	"
5/17	"	"	bent drum	Recommend 5/17
5/24	"	"	No Problem observed	NONE
6/1	"	"	"	"
6/7	"	J. W. Shemechico	leaking drum	repair by 6/1
6/14	"	H. L Dunn	No Problem observed	NONE
6/21	"	"	"	"
6/28	"	" "	"	"
7/7	"	"	"	"
7/13	"	"	"	"
7/20	"	"	"	"
7/29	"	"	"	"

Procedure No. 44

Date: October 2, 1980

Superseding Date: 6/6/79

Written By: C. W. Mucha

Subject: FIRE VALVE SHUT OFF

Approved By: [signature]

INTRODUCTION

The purpose of this procedure is to outline the steps necessary to shut off a section of the Plant's sprinkler protection system while that section of the Plant is in operation. This procedure applies to the Maintenance Department when they are repairing or modifying a section of the Plant's sprinkler protection system where it is necessary to shut off a post indicator valve (PI valve) a sectional control valve, or fire pump valve.

DETAIL

1) Notify the Plant Manager or his Representative of the valve number to be shut off, the affected section of the Plant (Fig. 1) and the reason for doing so. The Plant Manager or his Representative are the only personnel with the authority to authorize a shut down of the Plant Sprinkler System.

2) A red "Fire Valve is Shut" card (Fig. 2) indicating the valve number, the section of the Plant it controls, the date it was closed, the date it will be opened and the reason for closing the valve will be presented to the Engineering Superintendent or Designate for his signature.

3) The Engineering Superintendent or the Maintenance Supervisor, the Area Supervisor of the affected area and the Plant Guard shall be notified of the valve number to be shut off, the affected section of the Plant and the reason for doing so.

4) ADT shall be notified of the section of Plant that will be affected (Fig. 3) - Phone number: 243-6266.

5) In the case of a PI valve, the valve shall be closed by the handle provided, leaving the handle on the valve in the operating position.

6) Attach the "Fire Valve is Shut" card to the end of the valve handle so that it is really visible.

7) In the case of a sectional control valve, close the valve with the handle provided and leave the handle on the valve unless it hinders the operation of the Plant or poses a safety hazard itself.

8) Attach the "Fire Valve is Shut" card to the handle if attached to the valve, or as close to the valve as possible so that it is readily visible.

9) After the work has been completed, open the PI or sectional control valve and replace the valve handles to their original position.

Procedure No. 44

Date: October 2, 1980
S.D.: 6/6/79

10) The date the valve is opened and the signature of the Employee opening the valve shall be placed on the "Fire Valve is Shut" card and returned to the Maintenance Supervisor.

11) The Engineering Superintendent or Maintenance Supervisor, the Area Supervisor of the affected area, the Safety Supervisor, Wilmington S. & F., the Plant Guard and ADT shall then be notified that the sprinkler system is back into service.

CWM:jd

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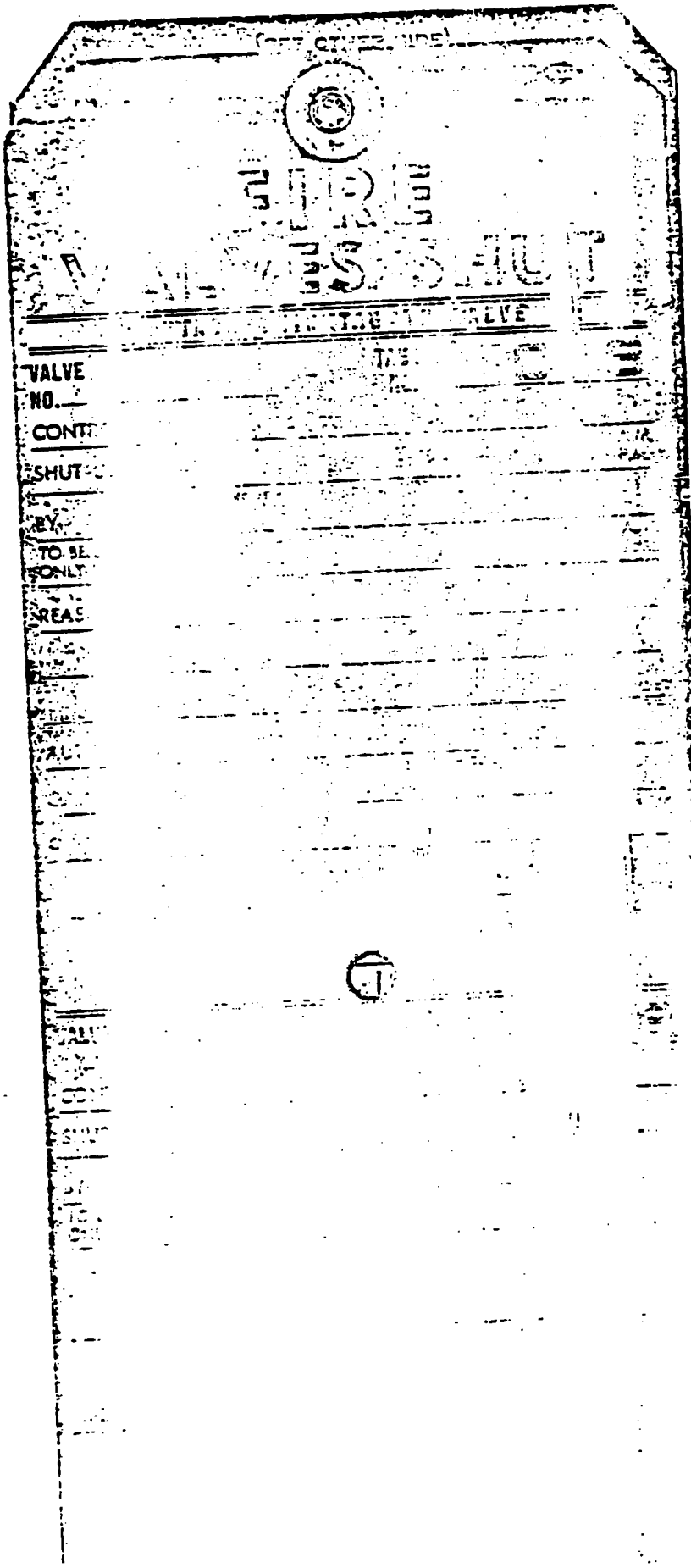
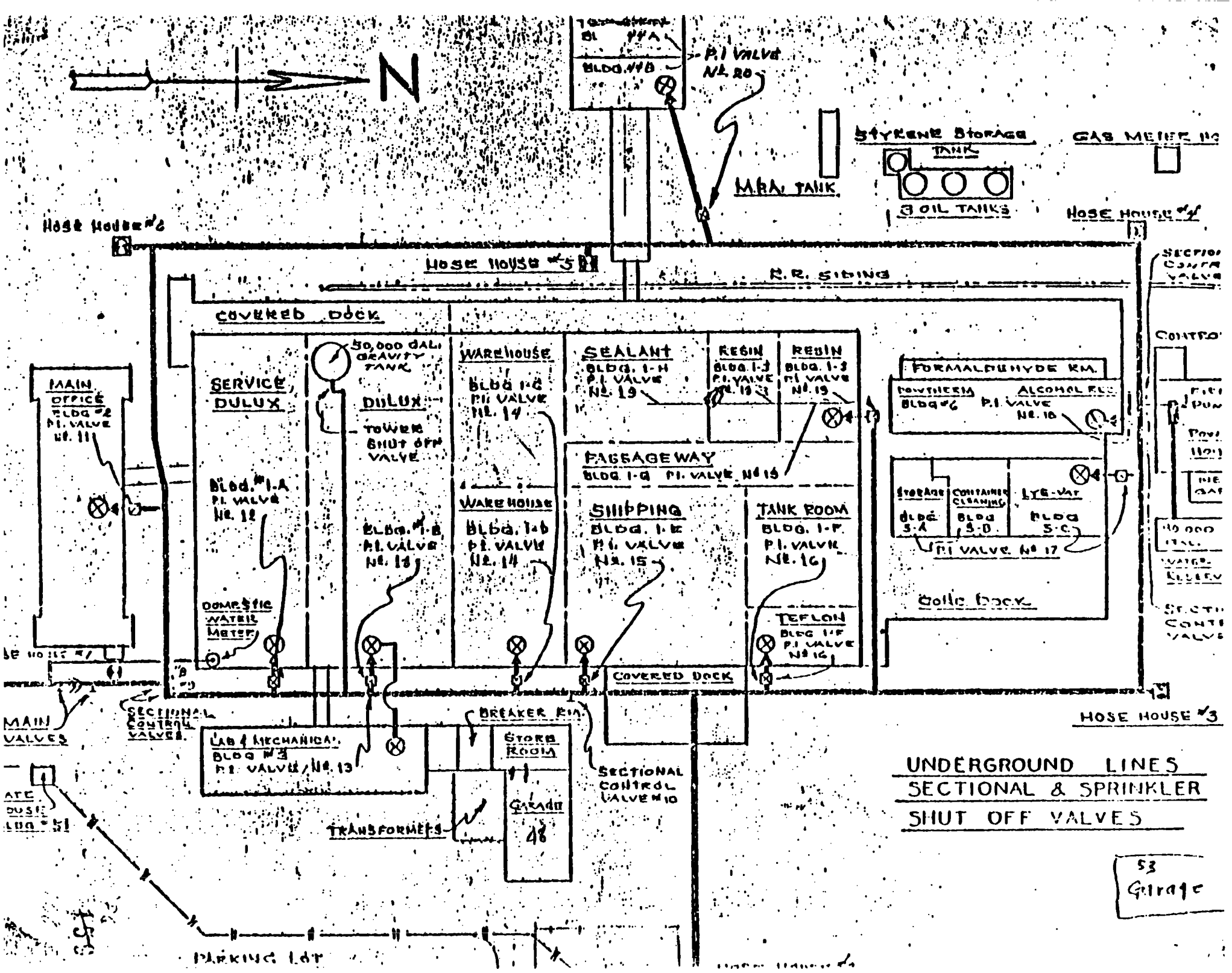
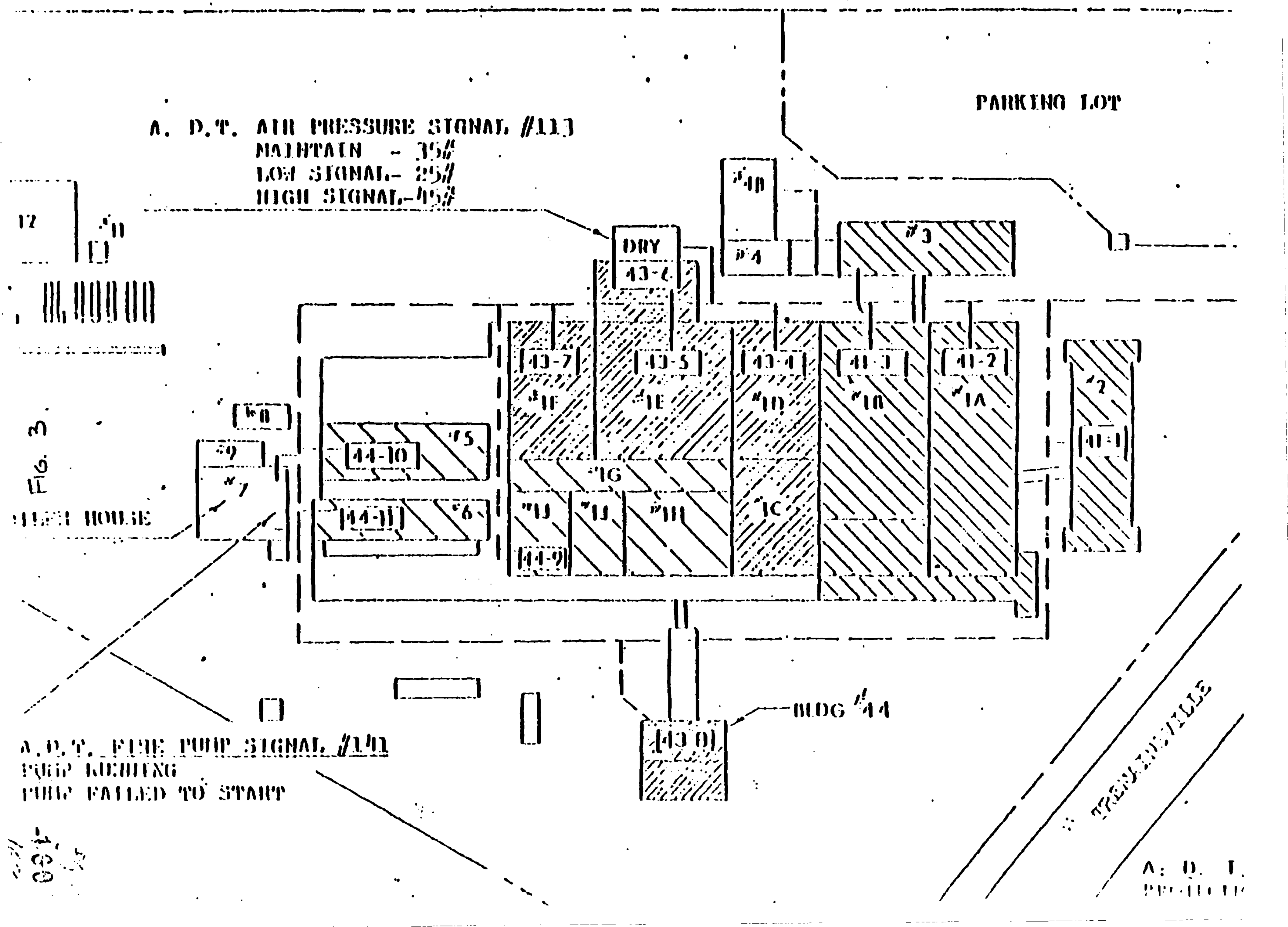
FIG. 2




N
BLDG. #4B
P.I. VALVE NO. 20
STYRENE STORAGE TANK
GAS METER NO
M.R.A. TANK
3 OIL TANKS
HOSE HOUSE #4
HOSE HOUSE #2
HOSE HOUSE #5
R.R. SIDING
COVERED DOCK
MAIN OFFICE BLDG #2 P.I. VALVE NO. 11
SERVICE DULUX
50,000 GAL GRAVITY TANK
DULUX TOWER SHUT OFF VALVE
BLDG. #1-A P.I. VALVE NO. 12
BLDG. #1-B P.I. VALVE NO. 14
DOMESTIC WATER METER
WAREHOUSE
BLDG 1-C P.I. VALVE NO. 14
WAREHOUSE
BLDG. 1-D P.I. VALVE NO. 14
SEALANT BLDG. 1-H P.I. VALVE NO. 19
RESIN BLDG. 1-J P.I. VALVE NO. 19
RESIN BLDG. 1-J P.I. VALVE NO. 19
PASSAGEWAY BLDG 1-G P.I. VALVE NO 15
SHIPPING BLDG. 1-K P.I. VALVE NO. 15
TANK ROOM BLDG. 1-F P.I. VALVE NO. 16
TEFLON BLDG 1-F P.I. VALVE NO 16
FORMALDEHYDE RM.
NONYLPHENOL BLDG #6
ALCOHOL RM. P.I. VALVE NO. 18
STORAGE BLDG S-A
CONTAINER CLEANING BLDG S-D
LYE-VAT BLDG S-C
P.I. VALVE NO 17
COVERED DOCK
HOSE HOUSE #3
MAIN VALVES
SECTIONAL CONTROL VALVES
LAB & MECHANICAL BLDG #3 P.I. VALVE NO. 13
BREAKER RM.
STORE ROOM
GARAGE
48
TRANSFORMERS
SECTIONAL CONTROL VALVE #10
PARKING LOT
UNDERGROUND LINES
SECTIONAL & SPRINKLER
SHUT OFF VALVES
53
Garage

SIGN[illegible] NO. 41, 43, 44 ARE INDICATED AS [illegible]



Sample of Safety Inspection Tickler

DEPT	SUB DEPT	FREQUENCY	C D	BLDG	DUE DATE	TICK NO	INSP NO
10	M1	WEEKLY		2	07/01/82	03	0001

DESCRIPTION

INSP. FIRE PUMP S-14 (SH-0020)

OK	NG	ACTION

C G

INSPECTED BY

6-30

INSPECTION DATE

Safety Procedure # 45

Date: September 7, 1979
Superseding Date: New
Written By: R. J. Baird
Approved By: [signature]

Subject: POWERED VEHICLE INSPECTIONS

INTRODUCTION

This procedure is designed to provide a method of vehicle inspection consistent with Plant safety requirements and OSHA regulations. Powered vehicles are defined as follows:

1. Fork Truck (gas or electric)
2. Transporters
3. Transtacker
4. Company cars and trucks
5. Tractors
6. Bobcats
7. Etc.

OUTLINE

A. Plant Safety Requirements
B. Legal Requirements and Inspection Frequency
C. Method of Inspection
D. Record Keeping

DETAIL

A. Plant Safety Requirements

1. No piece of powered equipment shall be operated when in an unsafe condition.
2. All substandard equipment is to be tagged out and brought to the immediate attention of supervision.
3. Before operating equipment, operators must see that the equipment has been inspected according to the proper timetable and assure themselves that the equipment is still in a safe operating condition.
4. Drive only equipment you are qualified to operate.

B. Legal Requirements and Inspection Frequency

1. All powered equipment must be inspected before use.
2. Records must be maintained for a period of 30 days.
3. Frequency of inspections required as follows:
   a) All fork lifts, transporters, transtackers, etc., must be inspected prior to use on every shift.
   b) Company cars, trucks, tractors, etc., need to be inspected each day before use

C. Methods of Inspection

1. Form (attached) is to be followed and checked as inspected.
2. Inspect all items on the checklist as applicable to the vehicle being inspected.
3. A short "test drive" will be necessary to complete the checklist.

D. Record Keeping

1. Completed checklists are to be displayed on the equipment during the time span the inspection covers.
2. Expired checklists are to be removed from the equipment and turned in to the responsible foreman.
3. Foreman are to review checklists as they are turned in to make certain they are being done. Initial the expired checklists.
4. Expired checklists should be displayed in or near the foreman's office for a period of one day for auditing purposes.
5. Expired checklists must be filed after one day and retained for 30 days.

R. J. BAIRD

RJB:jd

PC,

EMERGENCY SPEED CALL IN LIST

NAME	CODE	TELEPHONE NUMBERS
Fire Dept. & Rescue Squad	20	241-1221
C. Szafir	21	856-6358
E. P. Hartz	22	474-4787
C. B. Ogle	23	841-7831
C. E. Buonassisi	24	865-1592
R. Trueblood	25	874-1047
C. R. Smith	26	476-4289
B. O. McLouth	27	474-8444
J. Malek	28	841-7336
D. Johnson	29	729-2719
R. H. Clark	30	856-5639
Dr. J. R. Stevens	31	882-0660
F. B. Perry	32	536-8519
J. W. Shemechko	33	841-3139
H. J. Learman	34	841-8621
B. A. Brogle (Nurse)	35	382-4380
D. C. Teal	36	882-7562
R. J. Baird	37	885-4122
W. L. Cummings Jr.	38	885-3883
City Police (Toledo)	39	243-4141
A.D.T. (Alarm Company)	40	243-6266
Toledo Hospital	41	473-4218
Coast Guard (Ohio)	42	259-6448
Ace Oil (Emergency Clean Up)	43	726-1521
Ohio E.P.A.	44	1-800-282-9378
Chemtrec (DuPont Emergency No.)	45	1-800-424-9300
Matlack (Material Tank Carrier)	46	693-6531
	47	259-1500

OHD005041843.

Plant	TOLEDO F. & F. PLANT	Date	June 28th, 1982
Dept.	SECURITY	Written By	THOMAS A. KACZMAREK
Area	SERVICE		
Subject	SECURITY CONTRACT MANUAL	Approved	J. W. Shemechko

I. Introduction

The purpose of this Guard Manual is to aid the Contract and Plant Guard in implementing Security measures that will be in compliance with DuPont F. & F. Practices & Procedures in Plant Security on this site.

II. Plant Emergency Procedures & Action To Be Taken By Guard

1. Plant Disasters (Fire, Tornado, Spills)
2. Bomb Threats
3. Pollution Calls
4. Transportation Disaster
5. Shutdown of Critical Equipment
   a. Initiator Storage Bldg. - Procedure 27
   b. Dowtherm Boiler Room
   c. Low Temperature Trailers
   d. Boilers, Deep Well Pumps, & Compressors
   e. Hot Oil System (Resin)
6. Leaking Material In Cotton Shed (Bldg. #44)
7. Safety Procedure
8. Civil Disturbances

III. Plant Fire Protection Systems & Locations

1. Sprinkler System
   a. Areas Not Covered By System
2. Fire Extinguisher Types
3. Hose Reels
4. Hose Houses
5. P. I. Valves
6. Plant Fire Truck Location
7. Fire Pump
8. Fire Doors
9. City Tie Ins
10. Plant Schematic Showing A.D.T. Flow Signals
11. Notifying Fire Dept.
12. Thinner Farm Shut Off

VII. Plant Alarms, Functions & Procedures

1. Fire Alarm Boxes
2. Severe Weather Alarm
3. Bomb Threats
4. Pan Alarm In Gatehouse
5. Pan Alarms In R.C.T. Areas
6. Heat Alarm In Computer Room
7. Area Heat Alarms
8. I.G. Hallway Alarm Board
9. Alarm For Water Tower
10. All-Clear
11. Low Battery Alarm (Mechanical Alleyway)

VIII. Security Contraband Check

Procedure covers anything coming in or going out. Contraband can cover Camera's, Weapons, Liquor, etc. being brought into the plant. Materials going out must be accompanied be a Material Pass or Personal Property Pass or Bill of Lading.

IX. Miscellaneous

1. Company Car Use
2. Flying Of Flag
3. Safety Sign
4. Plant Employee Phone Numbers
5. Operating Speed Phone
6. Plant Incidents (Dealing With Press)
7. Proper Use Of Electric Gate
8. Use Of Crane On Plant
9. Plant Keys, Key Box & Key Book
10. Plant Speed Limits
11. Ground Wires
12. Motorcycle Parking
13. U.S. Government & Federal Agencies
14. Locking Of Plant Gatehouse
15. Sign In Books (Cafeteria & Plant Doctor)

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IV. Weekend Tours & Practices

1. A.D.T. Key Tour
   a. Half-way Security Station
   b. Security Round Schedule
2. Perimeter Check
3. What To Check For In Key Tour
4. Locking Of Plant Gates
5. Forms Used In Implementing Practice
6. Use Of Mechanical & Resin Call-In
7. Heavy Snow Alert Warning
8. Taking Calls
9. Handling Of S. Coded Material
10. Check Of Peterson Building

V. Main Gate - Working Procedures

1. Procedure For Registering Visitors
2. Use Of Page Boy System
3. Two-Way Radio
4. Use Of Plant Scale
5. Safety Glasses
6. Security Photo Album
7. Radio & Police, Fire & Weather Scanner
8. Visitors To Credit Union
9. Pensioners
10. Telephone, Gas, Water, Edison & A.D.T. Entering Plant
11. Outside Union Representatives Entering Plant
12. Handling Of Contractors
13. Work Rules & End Of Shift Signals
14. Call In Procedure (Snow Call In)
15. Holdover (Overtime)
16. Employees' Relations Entering Plant
17. Trucks Arriving Early
18. Loading & Unloading Permits
19. Forms Used In Main Gate Procedures
20. Nitrogen Tank Del.
21. Handling Of "Dulux" Tankwagons

VI. Contractors Gate

1. Location
2. Gate Procedure & Forms Used
3. City Inspectors, Union Business Agents
4. Contraband Check
5. Gate Hours

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT III
TRAINING PROGRAM

E.I. duPont deNemours, Inc.
U.S. EPA FACILITY ID #: OHD-005-041-843

H. PERSONNEL TRAINING

DU PONT'S SAFETY PROGRAM, SINCE THE LAST CENTURY, HAS STRESSED PERSONAL PROTECTION, FIRE PREVENTION AND THE SAFE HANDLING OF "HAZARDOUS" MATERIALS--INCLUDING RAW MATERIALS, INTERMEDIATES AND FINISHED PRODUCTS AS WELL AS WASTES. THE TRAINING FOR THIS PROGRAM IS PRESENTED TO EXISTING EMPLOYEES IN SMALL GROUPS OR TO A NEW EMPLOYEE (AT LEAST NEW TO HANDLING HW) BY A SUPERVISOR OR THE SOLID WASTE COORDINATOR.

THE GENERAL TRAINING OF PLANT PERSONNEL INCLUDES: PROCEDURES FOR USING, INSPECTING, REPAIRING AND REPLACING FACILITY EMERGENCY AND MONITORING EQUIPMENT, KEY PARAMETERS FOR AUTOMATIC WASTE FEED CUT-OFF SYSTEMS, AND SHUT-DOWN OF OPERATIONS. ALSO, NEW EMPLOYEES ARE TRAINED WITHIN 6 MONTHS.

FACILITY PERSONNEL HAVE BEEN TRAINED:

A. TO NOTIFY PROPER EMERGENCY AUTHORITIES WITHIN THE FACILITY'S EMERGENCY RESPONSE AUTHORITIES.

B. TO OPERATE AND MAINTAIN WASTE FEED CUT-OFF SYSTEMS OR STOP OPERATIONS.

C. TO CONTAIN AND COLLECT RELEASED WASTE, CONTAMINATED SOIL OR SURFACE WATER.

D. TO TREAT, STORE AND DISPOSE OF RECOVERED WASTE.

E. TO DECONTAMINATE EMERGENCY EQUIPMENT, PERSONAL PROTECTIVE GEAR AND PERSONNEL INVOLVED IN THE EMERGENCY.

F. TO SAFELY EVACUATE ALL PERSONNEL.

G. TO RESPOND TO NON-SUDDEN RELEASES.

H. WASTE TRANSFER PROCEDURES.

I. LABELING.

J. PLACARDING.

K. RECORDKEEPING.

L. REPORTING.

M. MONITORING R.C.R.A. REQUIREMENTS.

ALSO, EMPLOYEES DO NOT WORK IN UNSUPERVISED POSITIONS PRIOR TO TRAINING.

DESIGNATION OF THE WASTE MATERIALS AT THIS FACILITY AS HAZARDOUS UNDER RCRA POSES ABSOLUTELY NO NEW HAZARDOUS WORKING CONDITIONS FOR SITE EMPLOYEES OR SITE CONTRACTORS.

H-1. OUTLINE OF TRAINING PROGRAM

H-1A. JOB TITLES AND DUTIES

THE HANDLING OF RCRA DEFINED HW'S WILL NOT CHANGE THE SKILLS, PRACTICES OR PRE-REQUISITES FOR ANY OF THE PLANT EMPLOYESS. HENCE, THEIR NORMAL JOB OR POSITION DESCRIPTIONS ARE UNCHANGED. A LIST OF ALL THE POSITIONS ON THE SITE THAT HAVE ACTIVITY INVOLVING "HAZARDOUS WASTE" STORAGE AND THE PERSON CURRENTLY HOLDING THESE POSITIONS, IS ATTACHED. POSITION DESCRIPTIONS ARE AVAILABLE IN PERSONNEL.

H-1B. TRAINING CONTENT, FREQUENCY AND TECHNIQUES

SINCE MANY OF THE SUBJECTS COVERED HERE ARE ESTABLISHED, ONGOING JOB REQUIREMENTS FOR HANDLING RAW MATERIALS, INTERMEDIATES AND FINISHED PRODUCTS AT THIS SITE, ALL OF THE SUBJECTS WERE NOT GIVEN IN A SINGLE, FORMAL TRAINING SESSION BUT ARE INTRODUCED OVER

A PERIOD OF TIME THROUGH SAFETY MEETINGS, DISASTER DRILLS AND ON-THE-JOB REVIEWS.

TRAINING IS OF THESE TYPES:

1. INITIAL RCRA ORIENTATION DISCUSSION
2. NEW EMPLOYEE TRAINING
3. REFRESHER TRAINING (ANNUAL UPDATE)

FOR RCRA PURPOSES, 1981 REFRESHER TRAINING PLUS THE INITIAL RCRA ORIENTATION CONSTITUTED "INTRODUCTORY TRAINING". "NEW EMPLOYEES" ARE DEFINED AS THOSE NEW TO THE POSITIONS DESCRIBED IN H-1A.

TO BRIEF EACH EMPLOYEE ON THE SIGNIFICANCE OF RCRA, AN INTRODUCTORY SLIDE/TAPE PRESENTATION WAS MADE IN 1981. AN OUTLINE OF THE MATERIAL IS ATTACHED. TECHNIQUE USED WAS LECTURE. FAMILIARIZATION IS ONLY LEVEL OF TRAINING REQUIRED.

OTHER SUBJECTS COVERED IN REFRESHER TRAINING AND METHOD OF PRESENTATION ARE:

1. DRUM HANDLING (SLIDE/TAPE)
2. RESPIRATOR FITTING AND USE (HANDS ON)
3. SPILL-CLEAN-UP (SLIDE/TAPE)
4. STATIC (PROGRAMMED INSTRUCTION)
5. FIRE RESPONSE (2 DRILLS PER YEAR)
6. FIRE EXTINGUISHER TRAINING (HANDS ON)
7. DOT REGULATIONS (DISCUSSION WITH LEADER)
8. INDUSTRIAL HYGIENE (REVIEW CHECK SHEET)

THE ANNUAL REFRESHER WORK IS DONE IN CONJUNCTION WITH ANOTHER ESTABLISHED DU PONT TRAINING PROGRAM CALLED RHYTHM (REMEMBER HOW YOU TREAT HAZARDOUS MATERIALS) WHICH IS GIVEN TO APPROPRIATE SITE EMPLOYEES.

RECORDS ARE MAINTAINED AND REVIEWED ANNUALLY.

INDIVIDUAL HISTORY OF THE TRAINING IS MAINTAINED UNTIL CLOSURE OF THE FACILITY. DOCUMENTATION WILL BE KEPT FOR THREE (3) YEARS AFTER AN INDIVIDUAL IS TERMINATED.

H-1C. TRAINING DIRECTOR

THERE IS NO "TRAINING DIRECTOR" AS SUCH IN THE PLANT ORGANIZATION. THE SITE SOLID WASTE COORDINATOR (AND AN ALTERNATE AT THIS SITE) IS RESPONSIBLE FOR HW TRAINING. SITE SOLID WASTE COORDINATORS ARE TRAINED THROUGH FOUR (4) METHODS BY THE DEPARTMENT'S ENVIRONMENTAL PROTECTION COORDINATOR:

A. LITERATURE AND WRITTEN DIRECTIVES

B. TELEPHONE CONTACT (CONSULTATION AND ORAL DIRECTIVES)

C. SITE VISITATIONS (INTERNAL AUDITS AND DISCUSSIONS)

D. WORKSHOPS (PEER GROUP ADDRESSED BY DEPARTMENT AND CORPORATE STAFF)

THIS IS A CONTINUING EDUCATION PROCESS COVERING RCRA REGULATIONS, WASTE REDUCTION PROGRAMS AND WASTE DISPOSAL TECHNIQUES AND POLICIES. THE SITE COORDINATOR OFTEN INVOLVES FIRST LINE SUPERVISION IN TRAINING THEIR PARTICULAR EMPLOYEES.

H-1D. RELEVANCE OF TRAINING TO JOB POSITION

AS STATED IN THE INTRODUCTION, THE DU PONT SAFETY PROGRAM, SINCE THE LAST CENTURY, HAS STRESSED PERSONAL PROTECTION, FIRE PREVENTION AND THE SAFE HANDLING OF "HAZARDOUS" MATERIALS--INCLUDING RAW MATERIALS, INTERMEDIATES AND FINISHED PRODUCTS AS WELL AS WASTES. SOME OF THE RELEVANCE TRAINING INCLUDES: FIRE DRILLS (TWICE YEARLY), FIRE EXTINGUISHER TRAINING (HANDS ON TRAINING) AND MONTHLY SAFETY PROGRAMS (GIVEN TO ALL

EMPLOYEES). THEREFORE, DESIGNATION OF THE WASTE MATERIALS AT THIS FACILITY AS HAZARDOUS UNDER RCRA POSES ABSOLUTELY NO NEW HAZARDOUS WORKING CONDITIONS FOR SITE EMPLOYEES.

H-1E. TRAINING FOR EMERGENCY RESPONSE

THE TYPES OF TRAINING AND DRILLS OUTLINED IN H-1B HAVE BEEN A PART OF THE PLANT'S PREPARONESS FOR DECADES. INDIVIDUAL RESPONSE GROUPS (FIRE BRIGADE, FIRST AID TEAM, ETC.) HAVE PERIODIC TRAINING TO MAINTAIN THEIR READINESS AND TO TRAIN NEW MEMBERS NEEDED BECAUSE OF ATTRITION. THE EXTENSIVE DOCUMENTATION ATTACHED TO THIS PLAN COVERS THE MIRIAD OF DETAILS OF THE SITE PROGRAM.

H-2. IMPLEMENTATION OF TRAINING PROGRAM

AS INDICATED IN THE ATTACHMENT ON THE INTRODUCTORY RCRA TRAINING. INDIVIDUAL TRAINING RECORDS ARE MAINTAINED BY THE SOLID WASTE COORDINATOR. A FORMALIZED PROGRAM FOR PERSONS TRANSFERRING TO THE SERVICE AREA (WHERE MOST OF THE HW DRUM HANDLING IS DONE) IS ALSO ATTACHED. FORK TRUCK TRAINING AND LICENSING IS ALSO REVIEWED ANNUALLY.

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HAZARDOUS WASTE STORAGE OPERATIONS

JOB TITLE	NAME	DUTIES
SOLVENT RECOVERY OPERATOR	E. JACOB B. LAMBERT W. KOHN	PUMPS DIRTY WASH SOLVENT(DWS) FROM ONE STORAGE TANK TO ANOTHER; PUMPS DWS TO EVAPORATOR
MECHANIC (BOILER OPERATOR)	A. CASE	PUMPS DWS TO BOILER
LABORERS	D. BIALECKI R. JENNE G. ROSENBERGER P. MC HUGH	*MOVES HW CONTAINERS TO STORAGE AREAS; RECANS AND REPAIRS LEAKS OF HW CONTAINERS. PREPARES HW FOR SHIPMENT.
FACTORY FILLER	D. NAPPENBACH D. KRUEGER C. ESTEL B. MYERS T. THURLOW H. HOFBAUER M. BURTON R. SHEEHY D. BEAMON B. URBANOWSKI C. STROLLER R. STRONG D. GARTEE	*PUMPS DWS TO LYE VAT TANK STORAGE AREA AND LABELS WASTE DRUMS

HAZARDOUS WASTE TRAINERS

HAZARDOUS WASTE COORDINATOR	--J.W. SHEMECHKO	TRAINS PLANT MANAGEMENT AND EMPLOYEES ON HAZARDOUS WASTE REGULATIONS
ASSISTANT HAZARDOUS WASTE COORDINATOR	--H.L. DUNN	TRAINS PLANT MANAGEMENT AND EMPLOYEES ON HAZARDOUS WASTE REGULATIONS

*THE HW PORTION OF THESE DUTIES ARE A VERY SMALL PART OF THEIR TOTAL JOB.

INTRODUCTORY R.C.R.A. TRAINING

A TWO (2) DAY TRAINING PROGRAM PRESENTED 4/23/81 AND 4/24/81 WAS A FOLLOW-UP TO THE MARCH, 1980 PLANT SAFETY CO-OP GIVEN ALL PLANT EMPLOYEES, WHICH WAS AN INTRODUCTION TO R.C.R.A. AND ITS REGULATIONS. AN OUTLINE OF THAT PROGRAM IS AS FOLLOWS:

A. DEFINITION OF R.C.R.A., ITS PURPOSE AND DEFINITION OF SOME NEW TERMS THAT ARE A PART OF THIS NEW REGULATION.

1. R.C.R.A. - RESOURCE CONSERVATION AND RECOVERY ACT PASSED OCTOBER, 1976 AND EFFECTIVE NOVEMBER 19, 1980.

   - MAIN PURPOSE - TO PROTECT HUMAN HEALTH AND THE ENVIRONMENT FROM WASTES NOT LEAVING A SITE BY STACK (CLEAN AIR ACT COVERS THESE) OR BY DISCHARGE TO STREAM OR SEWER (CLEAN WATER ACT COVERS THESE).

   - SECONDARY PURPOSE - TO ENCOURAGE RE-USE, RECYCLING, RECLAMATION TO CUT THE TOTAL AMOUNT OF WASTE FOR DISPOSAL.

   - PROVIDES FOR "CRADLE TO GRAVE" TRACKING AND AUDITS TO PREVENT IRRESPONSIBLE DUMPING.

2. R.C.R.A. TERMS TO KNOW:

   A. "SOLID WASTE" IN R.C.R.A. NEED NOT BE SOLID AS WE THINK OF. IT CAN BE LIQUID, SLUDGE, ETC. (ANY WASTE THAT DOES NOT GO UP THE STACK OR DOWN THE SEWER).

   B. "HAZARDOUS WASTE" (HW) IS A SOLID WHICH IS LISTED BY THE EPA OR HAS ONE OF FOUR DANGEROUS
      - IGNITABLE - FLASH POINT UNDER 140°F (60°C) THIS INCLUDES MOST OF OUR PAINTS.

      - CORROSIVE - A STRONG ACID OR ALKALI.

      - REACTIVE - IT IS NORMALLY UNSTABLE AND READILY UNDERGOES VIOLENT CHANGE WHEN MIXED WITH WATER GENERATING TOXIC GASES, VAPORS OR FUMES IN A QUANTITY SUFFICIENT TO PRESENT A DANGER TO HUMAN HEALTH OR THE ENVIRONMENT.

      - EXTRACTION PROCEDURE TOXIC - WASTES WITH HEAVY METALS THAT MAY LEAK OUT INTO GROUND WATER FROM AN UNCONTROLLED DUMP. SEVERAL OF OUR PRODUCTS HAVE LEAD AND/OR CHROMATES.

3. OTHER R.C.R.A. TERMS:

   - "GENERATOR" - THE SITE WHO "MAKES" HAZARDOUS WASTE -- ALL EXEP DOMESTIC SITES ARE GENERATORS WITH AN EPA IDENTIFICATION (ID) NUMBER; NO LICENSE OR PERMIT IS NEEDED TO GENERATE.

- "TRANSPORTER" - A HAULER OF HW; ALSO HAS AN EPA ID NUMBER; HAULER MAY HAVE STATE OR LOCAL PERMIT OR LICENSE. IT IS UNLAWFUL TO SHIP (HW) BY A HAULER WITHOUT AN ID NUMBER.

- HAZARDOUS WASTE MANAGEMENT FACILITY (HWM) - AN OPERATION WHERE ONE OR MORE OF THESE HW ACTIVITIES ARE CONDUCTED.

  - TREATMENT
  - STORAGE
  - DISPOSAL

- MANIFEST - A NEW SHIPPING PAPER DESCRIBING THE HW WHICH MUST GO WITH IT WHEN TRANSPORTER LEAVES THE GENERATOR'S SITE. IT MUST STATE INFORMATION INCLUDING ID NUMBERS FOR THE GENERATOR, TRANSPORTER(S) AND HWM FACILITY (TREATER, STORER OR DISPOSER). A COPY SIGNED BY ALL PARTIES MUST COME BACK TO THE GENERATOR SO HE KNOWS WHERE THE HW WENT (CRADLE TO GRAVE TRACKING).

B. <u>RECORDS</u>

- TRAINING OF EACH EMPLOYEE MUST BE DOCUMENTED AND REVIEWED ANNUALLY.

- INDIVIDUAL HISTORY MUST BE MAINTAINED UNTIL CLOSURE OF THE PLANT.

- DOCUMENTATION MUST BE KEPT FOR THREE (3) YEARS AFTER AN INDIVIDUAL QUITS OR IS TERMINATED.

C. <u>ADDITIONAL INFORMATION INCLUDED IN THE PROGRAM</u>

- NEWSPAPER CLIPPING OF HOW NOT TO HANDLE HW - LOVE CANAL, VALLEY OF THE DRUMS, ETC.

- O DISCUSSIONS ON WASTE CHARACTERIZATION FORMS - WHAT THEY ARE AND THEIR PURPOSE - EACH HW STREAM WILL HAVE A WCF.

- O HOW TO LABEL HW DRUMS.

- O HOW TO DISPOSE OF LEAD/CHROMATE PIGMENT BAGS.

- O WHO TO ASK - "IS A WASTE HAZARDOUS?"

FINALLY, DU PONT HAS STRESSED PERSONAL PROTECTION, FIRE PREVENTION AND SAFE HANDLING OF "HAZARDOUS" MATERIALS, AS WELL AS WASTES; THEREFORE, DESIGNATION OF THE WASTE MATERIALS OF TOLEDO AS HAZARDOUS UNDER R.C.R.A. POSES ABSOLUTELY NO NEW HAZARDOUS WORKING CONDITIONS FOR THE PLANT EMPLOYEES.

H. L. DUNN
TOLEDO PLANT

TRAINING PROCEDURE-NEW EMPLOYEES

(5-DAYS)

MONDAY -

(each employee furnished with 8 x 12 envelope, pencil)

TUESDAY -

- Orientation check list and rules governing employee conduct and contraband materials on plant premises. (Conf. Room) (Item #1)
- Slide/Tape programs (2) and discussion "Drum Handling" covering breaking, rolling, dumping and "Drum Truck Handling".
- To Storeroom for gloves, towels, locker room for lockers.
- Safe elevator operation (elevator) (Item #2)
- Hands on drum handling, empties, full. Covers, breaking, rolling, taking off and putting onto pallets. Light and heavy drums.
- Drum trucks, hands on handling. (Wheeled drums to various areas) (Item #3)
- Scrap disposal program (Bob Munch)
- Discussion of "Dulux" Flow Chart. (Conf. Room) (Item #4)
- 2nd Tour of "Dulux" Area.

WEDNESDAY -

- Movie "Color of Danger". Discussion of proper use of fork lifts. (Conf. Room)
- Hands on basement fork lift.
- Hands on basement fork lift, transporter, drum upender.
- Respirator fitting, slide/tape. (Conf. Room)
- Respirator fitting in nurse's office.
- Electric fork lift, hands on. (Back Dock)

THURSDAY -

- Fred Peery-Safety Discussion. (Conf. Room)
- R. Baird - D.O.T. Regulations. (Conf. Room)
- Discussion "S" Codes. Industrial Hygene (Item #5) 8-basic rules. Slide/Tape "The Acceptable Risk".
- Outside fork lift. (Receiving Area)

THURSDAY - (Cont'd.)

- Fire Extinguisher Training (Mike Lettich) (Behind Boiler House)
- Demo of Cherry Picker in Warehouse (Ray Sheehy)
- Hands on instruction of palletizing, inspecting, figuring weights, stencilling drums on Filling Floor.
- Test on fork lift trucks (Item #6)

FRIDAY -

- Slide/Tape "Spill Cleanup" and discussion. (Item #7)
- Delivered drums from Receiving to 2nd floor. Third tour of "Dulux" Area.
- Static - movie
  Static - programmed instruction
- Hands on drum trucks, empty and full drums.
- Explanation and discussion of Job Description "Factory Filler".
- Slide/Tape "Vapor".
- Explanation of Batch Cards, discussion of Raw Materials (Item #8).

J-40

NEW EMPLOYEE CHECK SHEET-WAGE ROLL

Covered by supervisor after second week on plant Date:_____

TO:_____ Foreman:_____

During your first two weeks as a Du Pont employee, we have tried to make you familiar with many important rules and procedures. Since all may have an effect on your future, we want to determine if you thoroughly understand them.

The following questions are to be answered in writing, so your supervisor will know whether or not further instruction is necessary.

Please write your answers on a separate sheet, attach to this sheet and return to your supervisor.

1. What should you do if unable to report for work as scheduled?
2. What do you do if you report in after the regular starting time?
3. To whom do you report to when returning to work after an illness?
4. Where are the Safety Rules for your area posted?
5. May matches or lighters be brought on the plant?
6. In what areas are matches and lighters prohibited?
7. How are goggle areas designated?
8. What would you do if you were splashed with caustic or acid?
9. Where is the nearest safety shower?
10. Where is the nearest stretcher located?
11. Is it necessary to report minor injuries such as slivers, bruises and scratches?
12. How soon after an injury occurs must it be reported?
13. What do you do if you are injured on the plant? At home?
14. Where are the fire extinguishers located in the area in which you work?
15. What are the parking lot rules?
16. When do you attach ground wires? Why?
17. Under what conditions can you drive a Fork Lift truck onto a tractor-trailer?
18. To whom may you make suggestions to improve your job or the product you make?
19. To whom will you give any change of address or telephone number?
20. In case of fire, where would you turn in an alarm?
21. List two items of protective equipment. Are there others?
22. Must I use hand rails when descending stairways?

jrb

RULES GOVERNING EMPLOYEE CONDUCT
AND
CONTRABAND MATERIALS ON PLANT PREMISES

Item #1

In order to protect employees and the Company, the following regulations are established. Employee actions contrary to these regulations will subject the employee to disciplinary action, including dismissal. In all cases where rules have been broken, the facts and merits of the case will be given serious consideration by Management before disciplinary action is taken.

It is not intended that these rules cover all causes for disciplinary action up to, and including, dismissal; they are intended, however, to cover infractions which are obviously contrary to the best interests of all concerned.

Any one of the following acts is cause for disciplinary action which could include dismissal:

1. Unsatisfactory Safety Performance.
2. Unsatisfactory Job Performance.
3. Falsification of Records.
4. Wilfully abusing Company property, stealing, or committing dishonest acts.
5. Engaging in a fight on Plant property, or in activity that could provoke fighting.
6. Bringing weapons, intoxicants, illicit drugs or narcotics on Company property.
7. Bringing "strike anywhere" matches on the Plant, or having any type of match, cigarette lighter or flame-producing device in restricted areas.
8. Reporting for work under the influence of drugs or intoxicants.
9. Insubordination or deliberate refusal to comply with reasonable requests or instructions.
10. Unexcused absences or unsatisfactory attendance.
11. Immoral acts on the Plant.
12. Being away from the job without permission.
13. Acts of "horseplay" on Plant property.
14. Using or divulging, without permission, any confidential information acquired through employment with the Company.
15. Gambling on Plant property. (Note: This means gambling with dice, cards, lotteries, punchboards, the matching of coins, or other gambling for monetary gain. It also means acting as an agent for the purpose of collecting or paying off bets for personal gain or for an outside agency. It does not mean friendly matching for Coca-Cola, coffee, or other such items, but time is not to be spent away from the job, nor is Company equipment to be used in promoting pools.)
16. Offering any item for sale or soliciting for purchases of such items without express permission of Management.

I HAVE REVIEWED THE ABOVE RULES AND UNDERSTAND THEIR MEANING.

319

Signed: _____ Payroll No. _____

ITEM # 2

ELEVATOR OPERATION

Built-In Safety Features

1. In case of an emergency, dial "0" for the operator on days; dial "249" for the watchman on nights.
2. Explain how to turn on power and lights and use of emergency keys.
3. Explain the limit switches.
4. Free fall cut-off level and the bumpers at floor level.
5. Emergency escape through penthouse.

Load Limits

1. Maximum capacity is 8,000 lbs.
2. Fork lift trucks are <u>not</u> <u>permitted</u> to enter the elevators without the Service Foreman's presence.
3. Know the approximate weight of a load <u>before</u> placing on an elevator.
4. A transporter weighs approximately 1,500 lbs. Be sure to consider this weight when placed on an elevator with material.

Demonstration

1. Stress the potential hazards involved - keeping hands off gates, operation of elevator gates, etc.
2. Explain how to level an elevator using the sight glasses.
3. Observing and reporting water in elevator pits.
4. Shut elevator doors when not in use to prevent drafts in case of fire.

320

Employee's Signature

Item # 3

DRUM TRUCK HANDLING

Types of Drum Trucks

Basically, we have two types of drum trucks:

a. Those able to stand by themselves (used primarily by Service Area)

b. Those not able to stand by themselves (used in all areas throughout the plant)

General

All drum trucks, when not in use, must be placed out of the aisleway.

Never lay drum trucks down.

Report to your foreman drum trucks that are broken, hard to push, etc.

All drum trucks have guards on the upper part of the handle; be sure hands are always placed inside guards.

Review the proper method of picking up and setting drums down.

Special care must be exercised in handling drum trucks in "b" category above.

Demonstrate and explain dangers involved in removing drums from a pallet.

Never lift a drum without having the prongs positioned under the drum.

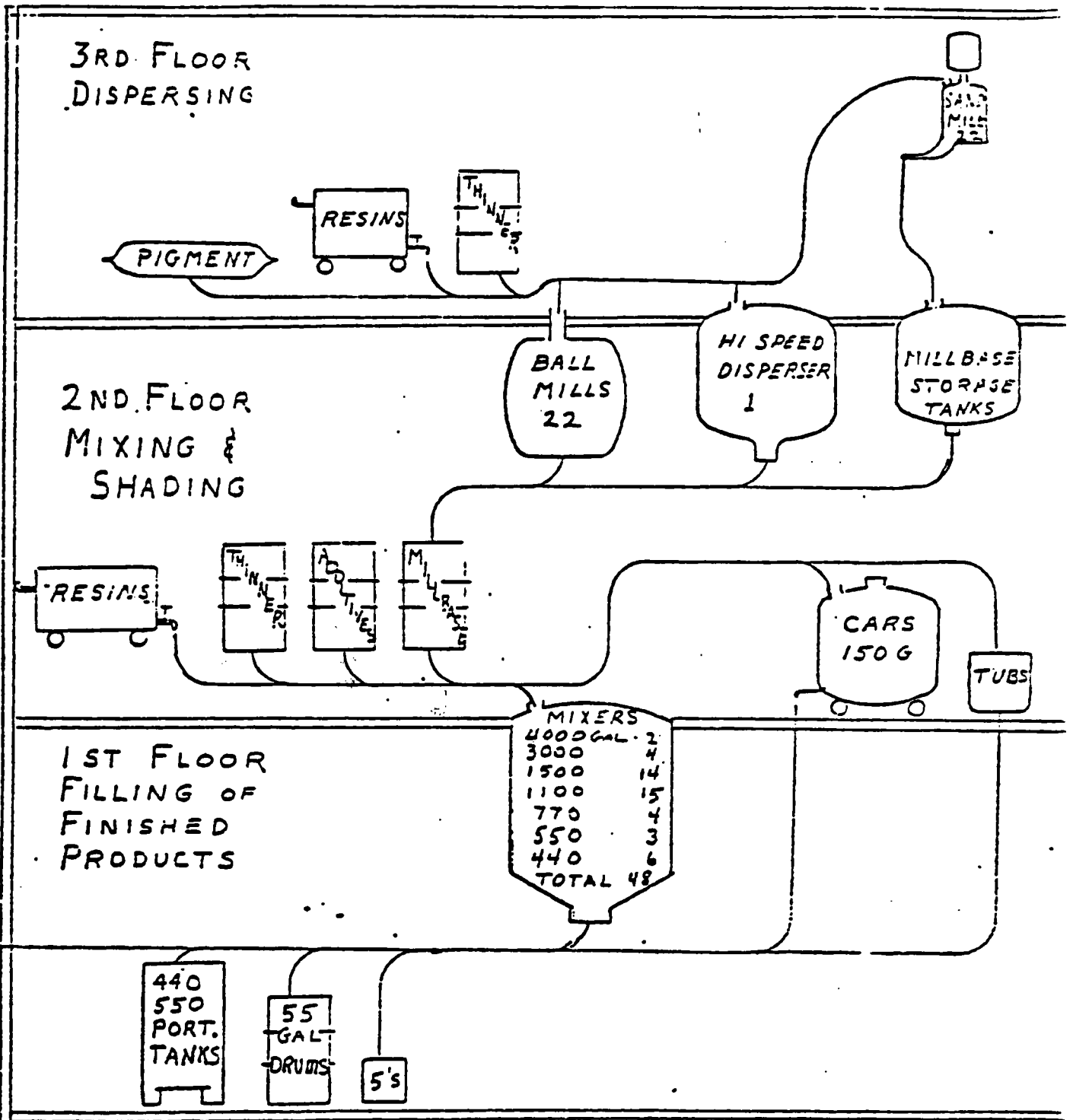
321

(Employee's Signature)

(Supervisor's Signature)

DULUX AREA, GENERAL FLOW PROCESS

ITEM # 4.



ITEM #5

EIGHT BASIC RULES OF INDUSTRIAL HYGIENE

1. No material is to be taken internally.

2. You must wash your hands before eating or smoking.

3. No food may be stored in a plant operating or storage area.

4. Close all containers when not in use. Spills must be cleaned immediately in accordance with established procedures.

5. All unnecessary personal contact with any material should be avoided.

6. The breathing of fumes or vapors of any material should be avoided.

7. Respirators must be worn when working with dusty materials.

8. All clothing contaminated with any hazardous material must be decontaminated or possibly thrown away. Your supervisor must be notified if you do get any hazardous material on your clothes or shoes.

ITEM #6

GENERAL RULES

SPILL CLEAN-UP

Spills containing S-0 to S-4 material:

1. Stop spill source if possible.
2. Notify supervision.
3. Open spill locker and obtain personal protective clothing and equipment.
4. Provide necessary fire protection to protect clean-up personnel.
5. Dike and cover with Sorb-All.
6. Plug all area drains if necessary.
7. Provide adequate ventilation.
8. Pick up spill - start from the outside and work in - never work in the middle of a spill.
9. Start final clean-up. Solvent mopping confined to sixteen (16) square feet per application.

Spills containing S-5 to S-7 material:

1. Evacuate area immediately.
2. Notify immediate supervision.
3. Notify Resin foreman for clean-up.
4. Seek necessary help if you have been splashed with the spill material.

LTIPLE CHOICE - Mark your answer on test answer sheet. ONLY ONE answer is correct.

1. BEFORE STARTING FORK TRUCK:

   a. Look to the front and rear making sure no one is there.

   b. Raise lift 2 or 3 feet from floor.

   c. Sound horn and start.

2. WHEN DRIVING A FORK LIFT TRUCK WITHOUT A LOAD:

   a. Tilt mast forward to improve vision.

   b. Keep forks approximately 6 inches from the floor.

   c. Put fork truck in fast speed to make use of the extra power.

3. WHEN DESCENDING A STEEP RAMP WITH A FULL LOAD:

   a. Position the load so it is level, place truck in forward gear and drive carefully.

   b. Drive forward, lean out so your vision will be unobstructed, sound horn and use hand brake.

   c. Tilt the load toward the mast and drive in reverse down the ramp.

4. WHEN LOADING OR UNLOADING TRUCKS:

   a. Truck wheels must be chocked, truck motor turned off, truck keys must be out of truck, go slow.

   b. Never drive the fork truck into the trailer.

   c. Sound horn, use high speed and keep the load near the floor.

5. WHEN PARKING A FORK LIFT TRUCK:

   a. Raise the forks and dismount.

   b. Lower forks to floor and dismount carefully. Be sure seat brake is set.

   c. Sound horn to warn other employees you are dismounting; lower forks to ground, grab the overhead guard and dismount quickly.

6. WHEN PICKING UP LOAD WITH A FORK LIFT TRUCK:

   a. Pick up load and take to destination.

   b. If load is too heavy for the truck, test it to see if it can be picked up.

   c. Know the capacity of your lift truck and do not overload it.

7. WHEN PICKING UP PALLETS OF MATERIAL:

   a. Don't waste time by inspecting the load, the other guy should have it loaded safely.

   b. Do not move unsafe loads.

8. TRUE OR FALSE

   Keep the load against the carriage by tilting back the mast. This steadies the load when the truck is in motion. _____

9. TRUE OR FALSE

   Lower the load as fast as possible. The hydraulic system should handle any severe strain. _____

10. THE FOLLOWING ARE GENERAL SAFETY RULES - MARK TRUE OR FALSE

    1. Riders are never permitted on fork lift truck. _____

    2. Special care must be used on wet, icy and snow-covered pavements. Speed must be reduced, brakes applied lightly so fork lift truck will not skid. _____

    3. When carrying load that obstructs view, either travel in reverse or assign another employee to direct the fork lift truck operator while he drives in forward position. _____

    4. Parts of the body should not be placed outside of the fork lift truck or between the upright of the mast and the truck. _____

    5. Keep your mind on what you are doing so distraction will not result in unsafe practices. _____

    6. No fork lift truck should be operated in an unsafe condition. _____

    7. The fork lift truck must be operated so it can be stopped without hitting people or objects. The driver must be alert. He is responsible if the unexpected happens such as someone stepping in front of the moving vehicle. _____

    8. The fork lift truck driver must always be alert to low clearances from doorways, pipelines, lighting fixtures, etc. _____

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT IV
CONTINGENCY PLAN

E.I. duPont deNemours, Inc.
U.S. EPA FACILITY ID #: OHD-005-041-843

G. CONTINGENCY PLAN

OHD 075041943

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69-~~118-130~~ 113-134 SPILL CONTINGENCY AND CLEAN UP PLAN

THIS PLAN IS A COMBINATION OF SEVERAL PREVIOUSLY EXISTING PROCEDURES THAN ENCOMPASS THE ACTIONS TO BE TAKEN IN RESPONSE TO ANY "DISASTER" ON THE PLANT--FIRE, EXPLOSION, SPILL, VAPOR RELEASE, MAJOR ACCIDENT, ETC. THE DESIGNATION OF CERTAIN MATERIALS AS HAZARDOUS WASTES UNDER RCRA REQUIRES ABSOLUTELY NO CHANGE IN THE "EMERGENCY CONTROL PLAN A-FIRE, EXPLOSION AND OTHER INTERNAL INCIDENTS" (PROCEDURE NO. 19-A) (SEE ATTACHED). IN ADDITION, A SPILL PREVENTION CONTROL AND COUNTERMEASURES (SPCC) PLAN (ALSO ATTACHED) IS IN EXISTENCE BECAUSE OF THE SITE'S NPDES PERMIT. THE PREVENTION AND PREPAREDNESS PLAN (PPP) AND SEVERAL OTHER SPECIFIC PLANS ARE ALSO ATTACHED.

G-1. GENERAL INFORMATION

THIS PLAN AND ALL ATTACHMENTS PROVIDES EMERGENCY RESPONSE PROCEDURES FOR THE FOLLOWING DU PONT OWNED AND OPERATED MANUFACTURING PLANTS:

E. I. DU PONT DE NEMOURS & CO., INC.
FINISHES & FABRICATED PRODUCTS DEPARTMENT
1930 TREMAINSVILLE ROAD
TOLEDO, OHIO 43613

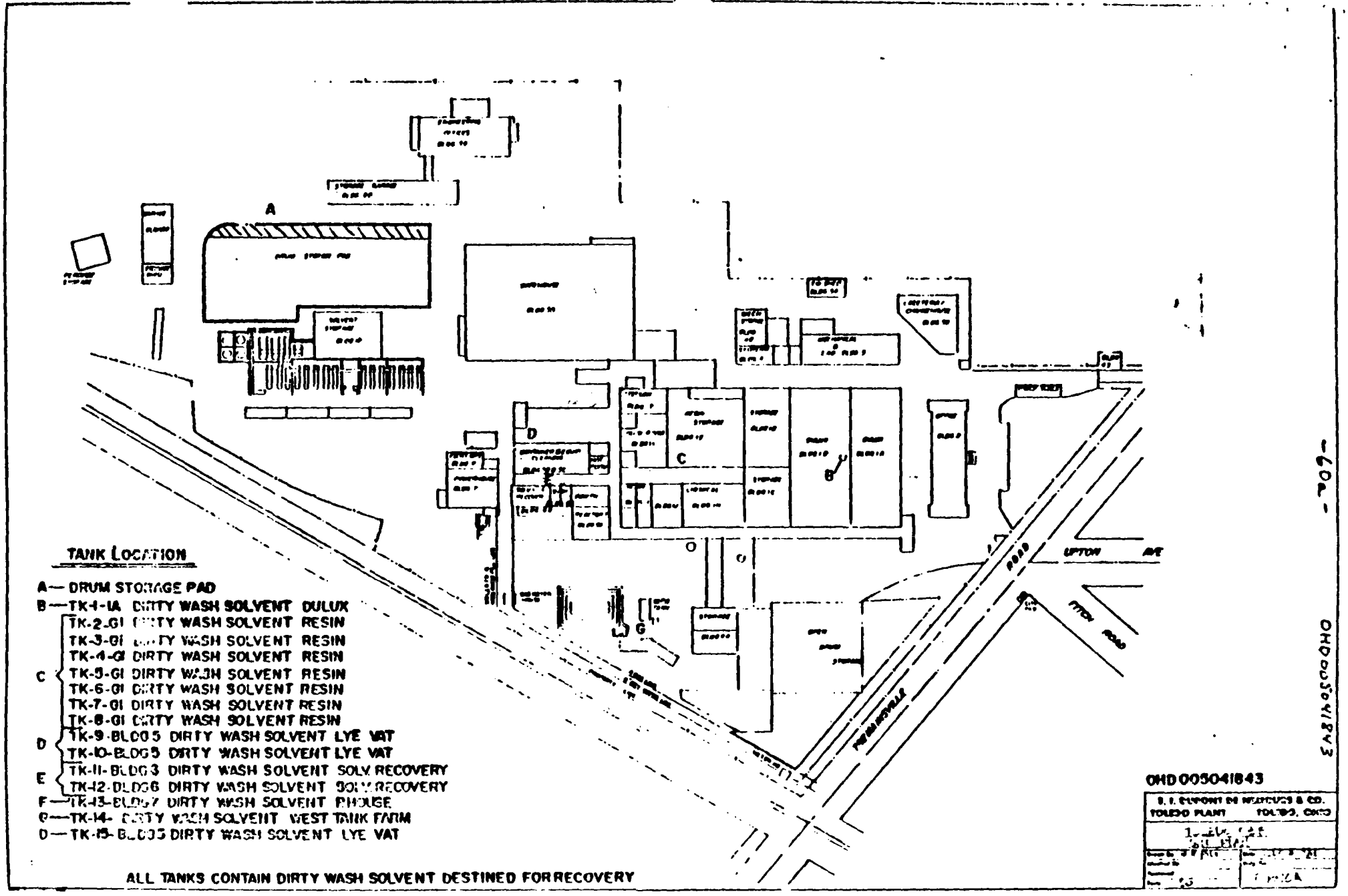
LUCAS COUNTY

A SITE PLAN IS ATTACHED. THE PLANT PRODUCES A WIDE VARIATION OF PAINTS AND OTHER SURFACE COATING MATERIALS FOR A NUMBER OF INDUSTRIES. IN CONJUNCTION WITH THE HAZARDOUS WASTES (HW) GENERATED AS A RESULT OF PAINT PRODUCTION, THE SITE OPERATES A HW CONTAINER STORAGE PAD AND SEVERAL HW STORAGE TANKS (SEE SITE PLAN FOR LOCATIONS).

G-2. EMERGENCY COORDINATORS

AS OUTLINED IN THE EMERGENCY ORGANIZATION (PROCEDURE 19-A), THE COODINATOR ON THE DAY SHIFT IS THE PRODUCTION SUPERINTENDENT (ALTERNATES ARE THE "DULUX" AREA AND TECHNICAL SUPERVISORS). AT NIGHT, THE CONTROL LABORATORY SUPERVISOR WILL ACT AS COORDINATOR UNTIL THE PRIMARY COORDINATOR (OR AN ALTERNATE) CAN BE CALLED INTO THE SITE. THE CURRENT LIST OF COORDINATORS IS ATTACHED.

THE COORDINATORS HAVE THE RESPONSIBILITY AND AUTHORITY FROM THE PLANT MANAGER TO PROMPTLY COMMIT PLAN FORCES AND RESOURCES--AND TO CALL IN OUSIDE ASSISTANCE AS NEED (CITY, STATE OR CONTRACTOR FORCES)--TO ADEQUATELY DEAL WITH ANY EMERGENCY SITUATION.



TANK LOCATION

A— DRUM STORAGE PAD
B—TK-1-IA DIRTY WASH SOLVENT DULUX
C
- TK-2-GI DIRTY WASH SOLVENT RESIN
- TK-3-GI DIRTY WASH SOLVENT RESIN
- TK-4-GI DIRTY WASH SOLVENT RESIN
- TK-5-GI DIRTY WASH SOLVENT RESIN
- TK-6-GI DIRTY WASH SOLVENT RESIN
- TK-7-GI DIRTY WASH SOLVENT RESIN
- TK-8-GI DIRTY WASH SOLVENT RESIN

D
- TK-9-BLDG 5 DIRTY WASH SOLVENT LYE VAT
- TK-10-BLDG 5 DIRTY WASH SOLVENT LYE VAT

E
- TK-11-BLDG 3 DIRTY WASH SOLVENT SOLV RECOVERY
- TK-12-BLDG 6 DIRTY WASH SOLVENT SOLV RECOVERY

F—TK-13-BLDG 7 DIRTY WASH SOLVENT PHOUSE
G—TK-14- DIRTY WASH SOLVENT WEST TANK FARM
D—TK-15-BLDG 5 DIRTY WASH SOLVENT LYE VAT

ALL TANKS CONTAIN DIRTY WASH SOLVENT DESTINED FOR RECOVERY

OHD 005041843

E. I. DUPONT DE NEMOURS & CO.
TOLEDO PLANT TOLEDO, OHIO

OHD005041843

-606-

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EMERGENCY COORDINATORS

PRIMARY COODINATOR

FREDERICK P. HARTZ, PRODUCTION SUPERINTENDENT

OFFICE PHONE (IN PLANT): 358 (478-1358)

PAGER UNIT NO. 54

HOME PHONE: Non-responsive

SPEED CALL IN NO.: 22

ALTERNATES - DAYS

HARVEY J. LEARMAN, "DULUX"

OFFICE PHONE: 244 (478-1244)

PAGER UNIT NO. 53

HOME PHONE: Non-responsive

SPEED CALL NO. 34

DONALD C. TEAL

OFFICE PHONE: 347 (478-1347)

PAGER UNIT NO. 25

SPEED CALL NO. 36

ALTERNATE - NIGHTS

(ROTATING SHIFTS)

D. GREEN) CONTROL LAB

K. H. GILL) SUPERVISOR

L. E. WEBB)

OFFICE PHONE NO. 205 (478-1205)

PAGE UNIT NO. - NONE

HOME PHONE: N/A

G-3. IMPLEMENTATION

THE PLAN IS IMPLEMENTED BY PULLING ANY FIRE ALARM BOX--EVEN IF THE DISASTER IS NOT A FIRE (THE RESPONSE IS THE SAME). TEAMS RESPOND AND THE DISASTER CHIEF MAKES AN EVALUATION OF THE SITUATION (RADIO COMMUNICATION IS ESSENTIAL HERE). THE COORDINATOR THEN IMPLEMENTS FURTHER ACTION AS APPROPRIATE (CALL-INS, FIRE DEPARTMENT, EVACUATION, ETC.). THE PHILOSOPHY OF REACTING PROMPTLY WHEN IN DOUBT ASSURES FULL IMPLEMENTATION WHEN THE INCIDENT IS SIGNIFICANT. DRILLS ARE HELD REGULARLY TO ASSURE ALL PERSONNEL ARE FAMILAR WITH THEIR ROLE AND RESPONSE.

G-4. EMERGENCY RESPONSE PROCEDURES

G-4A. NOTIFICATION

THE GAMEWELL FIRE ALARM SYSTEM HAS MULTIPLE HORN/BELL LOCATIONS AUDIBLE THROUGHOUT THE SITE WHICH GIVE A SIGNAL INDICATING LOCATION OF BOX PULLED. THE PLANT RADIO SYSTEM (OUTLINED IN PROCEDURE 19-A UNDER COMMUNICATIONS) IS USED FOR NOTIFICATION AND FEED BACK. THE DESIGNATED SUPERVISORS AND MANAGERS IN THE PLAN CARRY THESE RADIOS AT ALL TIMES AS PART OF NORMAL PLANT COMMUNICATIONS. THE GUARDS HAVE AN ACCELERATED SPEED CALL-IN SYSTEM IF THE PRIMARLY COORDINATOR AND OTHER MANAGEMENT PERSONNEL ARE NOT ON THE SITE (4:30 P.M. TO 8:00 A.M. OR SHUT-DOWN DAYS). THE GUARDS ALSO HAVE NUMBERS OF OFF-SITE RESPONSE AGENCIES TO CALL. IN EVENT OF A MAJOR FIRE OR SPILL THAT CANNOT BE CONTAINED, THE O.H.E.P.A WILL BE NOTIFIED. STATE EMERGENCY RESPONSE AUTHORITES HAVE REVIEWED POTENTIAL ASSISTANCE THAT BY BE PROVIDED IN AN EMERGENCY. THE RESPONSE TIME IS FOUR (4) MINUTES.

G-4B. IDENTIFICATION OF HAZARDOUS MATERIALS

ESSENTIALLY ALL RAW MATERIALS, INTERMEDIATES, FINISHED PRODUCTS AND HW ON THE SITE ARE HAZARDOUS FOR THE SAME REASON: IGNITABILITY. NO OTHER PROPERTY OF THESE WASTES IS PERTINENT FOR EMERGENCY RESPONSE. FOR EMERGENCY RESPONSE, ONLY THE HAZARDS OF SMOKE INHALATION AND BURNS DUE THE IGNITABILITY CHARACTERISTIC OF THE SITE'S HAZARDOUS WASTE NEED TO BE CONSIDERED.

G-4C. ASSESSMENT

THE POTENTIAL HAZARDS TO HUMAN HEALTH INVOLVE ONLY BURNS AND SMOKE INHALATION. NO PROCEDURES INVOLVING NEIGHBORS OR STREET TRAFFIC WOULD BE REQUIRED OTHER THAN NORMAL CITY OF TOLEDO FIRE/POLICE ACTIVITY AT A FIRE SCENE. ON THE PLANT FIRE BRIGADE RESPONSE (OUTLINED IN PROCEDURE 19-A) WILL BE ADEQUATE TO EXTINGUISH ALL BUT THE LARGEST FIRES; CITY OF TOLEDO FIRE DEPARTMENT WILL BE CALLED IF THERE IS ANY FIRE NOT IMMEDIATELY EXTINGUISHED BY OPERATORS. THE EMERGENCY COORDINATOR, IN CONSULTATION WITH THE DISASTER CHIEF AND THE SOLID WASTE COORDINATOR, WILL CALL THE NATIONAL RESPONSE CENTER (1-800-424-8802) AND OHIO EPA CONTACTS FOR DISCHARGES UNDER THE CLEAN WATER ACT, RCRA OR CERCLA (SUPERFUND) AS APPROPRIATE.

PROCEDURE NO. 7 (ATTACHED) EXPLAINS TANK MARKINGS WHICH PROVIDE EASY RECOGNITION OF HEALTH, FIRE AND REACTIVITY HAZARDS. THESE ARE NFPA NATIONAL STANDARDS AND KNOWN TO OUTSIDE FIRE DEPARTMENT PERSONNEL.

G-4D. CONTROL PROCEDURES

THE TYPES OF EQUIPMENT AVAILABLE AND SPECIFIC PROCEDURES TO FOLLOW ARE DETAILED IN SECTION G-5 AND THE ATTACHED PLANT SAFETY PROCEDURES (NOS. 19-A, 22, 7, 42, AND 36). THE PPP AND

STANDARD PRACTICES (NOS. V-2 AND V-10).

G-4E. PREVENTION OF RECCURRENCE OR SPREAD OF FIRES, EXPLOSIONS OR RELEASES

THE USE OF WATER AND/OR FOAM TO SUPRESS FIRES AND REMOVE THE SOURCE OF IGNITION WILL PREVENT FURTHER DANGER FROM FIRES. ALL OPERATIONS (EXCEPT RESIN KETTLES) ARE STOPPED WHEN THE ALARM IS SOUNDED AND ALL PERSONNEL EVACUATE IF NOT ON A SPECIFIC RESPONSE TEAM. AN IMMEDIATE INVESTIGATION IS INSTITUTED TO DETERMINE THE CAUSE. ANY SPILLED WASTE WILL BE PUMPED TO DRUMS OR CONTRACTOR TANK WAGONS.

G-4F. STORAGE AND TREATMENT OF MATERIAL

NO TREATMENT WOULD BE REQUIRED FOR MATERIAL RESULTING FROM EMERGENCY INCIDENTS AT THE SITE. THE IGNITABLE MATERIAL WOULD NORMALLY BE DRUMMED OR PUT INTO PORTABLE TANKS AND PLACED IN CONTAINER STORAGE. IF LARGE QUANTITIES OF WATER CONTAMINATED WITH ORGANICS IS GENERATED, A CONTRACTOR TANK WAGON/VACUUM TRUCK WOULD BE UTILIZED. TEMPORARY STORAGE DURING CLEANUP COULD BE DONE AT THE VACANT AREA BEHIND THE GARAGE OR PAVEMENT IN FRONT OF THE WAREHOUSE IF THE STORAGE PAD WAS THE LOCATION OF THE INCIDENT.

G-4G. INCOMPATIBLE WASTE

THERE IS NORMALLY NO INCOMPATIBLE WASTE ON THE SITE. IF ANY SHOULD BE GENERATED, DRUMS WOULD BE SEGREGATED AT THE END OF THE STORAGE PAD. IF THE PAD WAS INVOLVED IN THE INCIDENT, TEMPORARY STORAGE OF DRUMS COULD BE DONE BEHIND THE GARAGE OR ON PAVEMENT IN FRONT OF FINISHED PRODUCT WAREHOUSE.

G-4H. POST-EMERGENCY EQUIPMENT MAINTENANCE

NORMAL PLANT PROCEDURES REQUIRE REPLACEMENT OF FIRE

EXTINGUISHERS AFTER USE, DRY AND REPLACE HOSES, RESUPPLY FOAM, REFILL AIR BOTTLES FOR SCOTT AIRPACKS, ETC. MANY RESERVE ITEMS ARE IN STORAGE AND WOULD BE PUT IN SERVICE WHILE REFURBISHING AND REPLENISHING EQUIPMENT.

G-4I. CONTAINER SPILLS AND LEAKAGE

THE ATTACHED PROCEDURES OUTLINED EQUIPMENT TO USES, SAFETY PRECAUTIONS TO BE TAKEN, AND RESPONSIBILITY FOR SPILL CLEAN UP. ANY DAMAGED OR LEAKING HW CONTAINERS FOUND DURING THE WEEKLY INSPECTION ARE TO BE REPAIRED (NEW BUNG GASKETS, ETC.) OR RE-DRUMMED AT ONCE (SAME SHIFT). SPILLS ARE INVESTIGATED FOR FUTURE PREVENTION AND OPERATORS DISCIPLINED IF NEGLIGENT.

G-4J. TANK SPILLS AND LEAKAGE

THE SAME PROCEDURES APPLY TO TANK OVERFLOW OR LEAKS. THE TWO LARGE OUTSIDE HW TANKS ARE IN INDIVIDUAL DIKES WHICH CAN BE PUMPED OUT TO PORTABLE TANKS IF A SPILL OCCURS. SPILLED MATERIAL IS ULTIMATELY INCINERATED BY AN APPROVED INCINERATION SITE.

G-4K. WASTE PILES

THERE ARE NO WASTE PILES ON THIS SITE.

G-5. EMERGENCY EQUIPMENT

SPILL CONTROL EQUIPMENT LOCKERS ARE LOCATED IN EACH AREA OF THE PLANT. ABSORBENT MATERIAL IS LOCATED IN DRUMS AT THE CONTAINER STORAGE PAD. THE ATTACHED PREVENTION AND PREPAREDNESS PLAN (PPP) HAS A LIST OF THE FIRE PROTECTION EQUIPMENT. ALL EMERGENCY EQUIPMENT, CONTAMINATED PROCESS EQUIPMENT, AND PERSONNEL AND PROTECTIVE GEAR WILL BE DECONTAMINATED AND ANY HAZARDOUS WASTE WILL BE PROPERLY DISPOSED OF.

G-5. COORDINATOR AGREEMENTS

THE CITY OF TOLEDO FIRE, RESCUE AND POLICE UNITS ARE OBLIGATED TO RESPOND WHEN CALLED BY THE PLANT. NO WRITTEN AGREEMENT EXISTS, IS NEEDED OR DESIRED. THE FIRE DEPARTMENT IS INVITED TO TOUR THE SITE AT LEAST ANNUALLY FOR FAMILIARIZATION WITH POTENTIAL FIRE HAZARDS AND OUR INTERNAL FIRE HAZARDS CAPABILITIES. WE HAVE HYDRANT FITTINGS, ETC. WHICH ARE FULLY COMPATIBLE WITH THE CITY EQUIPMENT.

SINCE FIRE IS THE ONLY EMERGENCY SITUATION OUR HW COULD BE INVOLVED IN, THE ONLY RESPONSE UNIT THAT IS IN NEED OF FAMILILARIZATION IS THE TOLEDO FIRE DEPARTMENT AND RESCUE SQUAD (SEE DISCUSSION IN SECTION E OF THE ATTACHED PPP).

G-7. EVACUATION PLAN

UPON IMPLEMENTATION OF EMERGENCY CONTROL PLAN A (FIRE ALARM SIGNAL), ASSIGNED PERSONNEL RESPOND TO THEIR TASKS (FIRE BRIGADE, FIRST AID PERSONNEL, COORDINATORS, ETC.). ALL OTHER PERSONNEL EVACUATE TO NON-OPERATING AREAS AT THE FRONT OF THE PLANT FOR A HEAD COUNT. VISITORS AND CONTRACTORS MUST REPORT TO THE GATE HOUSE FOR A HEAD COUNT BY THE GUARDS. ALL PERSONNEL ARE AWARE OF ALTERNATE STAIRWAYS AND ROUTES FROM THE OPERATING AREAS.

G-8. REQUIRED REPORTS

A SIGNFICANT INCIDENT INVOLVING HW REQUIRING THE IMPLEMENTATION OF THE CONTINGENCY PLAN MUST BE REPORTED TO THE REGIONAL ADMINISTRATOR (USEPA, REGION V, 111 WEST JACKSON BLVD., CHICAGO, IL 60604) WITHIN 15 DAYS. INFORMATION REQUIRED IS OUTLINED AT 40 CFR 264.56(J).

025-24
ITEM 5 OF 6

VII. PREPAREDNESS AND PREVENTION PLAN

A. General

1. The primary purpose of this plan is to manage the facility safely without fires, explosions or injury to employees. Du Pont has traditionally maintained a safe working place with minimum accidents, spills or fires. This site has its own safety and occupational health audits. There are also corporate audits. Hazardous waste rules as defined by RCRA add no new hazards or safety problems to our site.

B. Emergency Site Equipment

1. Hose Houses/Boxes

   There are six hose houses each with 200' to 300' of 2-1/2" hose and a hydrant connected to an eight inch water main. Three houses are on the east side of the plant and three are on the west side.

2. Emergency Van

   A Chevrolet Van is kept in the Mechanical storage building. It is equipped with hand fire fighting equipment, Scott Air Paks, protective clothing and a standby electrical generator.

3. Foam Trailer

   This carries a 500 gallon tank of aerofoam, #00-6% liquid, hose and nozzles. It is kept in the Mechanical storage building and is pulled by the emergency van. It is used to fight fires anywhere on the facility or it can supply foam to the tank farm manifold system.

4. North Tank Farm Foam Manifold System

   This is a system of piping and foam distributors which covers the five (5) diked section of the tank farm. Foam is supplied through the foam trailer and hydrant hook-up.

5. One-Inch Hose Reels

   There are 21 one-inch hose reels with fog nozzles located throughout the manufacturing building. These reels have 50' of hose which is sufficient to overlap the area covered by the adjacent reels. These nozzles spray water over the fire, cutting off the oxygen supply to the fire.

6. Sprinklers

   Buildings on the facility are protected by automatic sprinklers except the powerhouse, garage, storeroom, Mechanical storage building and gatehouses. The heads will rupture normally at 135°F. These sprinklers help contain the fire until fire fighting crews arrive. All sprinkler systems are connected to ADT's control panel downtown who notify plant supervision and/or the City Fire Department which can be at the facility ready to fight the fire within a few minutes from the time the sprinkler head ruptures.

VII. PREPAREDNESS AND PREVENTION PLAN

B. Emergency Site Equipment

7. Fire Pump and Reservoir

We have two (2) storage facilities on the site for water to be used for fire fighting. One is the 50,000 gallon tank on the roof and the second is the 80,000 gallon reservoir at the Powerhouse. Our diesel fire pump is connected to the 80,000 gallon reservoir and can pump 1,500 gpm of water, if needed at 125 psig.

8. Automatic Dry Powder Systems

There are ten (10) systems located at various scale pipe headers in the plant. Two are in Small Batch, one in "Dulux" 1-B-2, one in No. 3 Resin Kettle Room, one in 1-E Warehouse and two in the Portable Tank Cleaning Area. These operate automatically by means of fusible links in event of a fire. In addition, solvent lines at draw stations are equipped with self-closing ball valves held open by fusible links.

9. Fire Extinguishers

a. Water - Six (6) 2-1/2 gallon units are located in the halls of the Main Office Building - one on the first floor and one on the second floor. Note: except for these extinguishers, fires in ordinary combustibles are to be fought with these lines.

b. CO2 - There are 100 CO2 units on the Plant in the following sizes:

1. 3 - 2-1/2"
2. 30 - 5#
3. 8 - 10#
4. 21 - 15#
5. 34 - 20#

These are for use primarily on electrical and solvent fires.

c. Dry Powder - There are 97 hand type 20# and 10# extinguishers located throughout the Plant. In addition, there are eight wheeled type 150# units and two 350# units in strategic areas.

d. Met-L-X - We have four 30# Met-L-X dry powder extinguishers which are used for magnesium and other metal fires. They are located on 1-A-3, 1-A-2 and 1-A-1 for protection against magnesium paste fires and in the welding shop for portable tank repair coverage.

VII. PREPAREDNESS AND PREVENTION PLAN

B. Emergency Site Equipment (continued)

9. Fire Extinguishers (continued)

e. Inspection of Extinguishers

All fire extinguishers must be inspected monthly by the area supervisor. A record of inspections is attached to each extinguisher. The Mechanical Department will inspect quarterly.

It will be the responsibility of the area supervisor to check all fire extinguishers in his or her area to see that they remain in their proper locations.

(1) CO2 extinguishers are check weighted quarterly and must be recharged whenever more than 10% off. They are checked monthly for broken seals and general operating conditions.

(2) When an extinguisher has been damaged, discharged or if pressure is found to be low, the supervisor of the area will imediately notify the Mechanical Department. The Mechanical Department will replace the extinguisher and be responsible for repairs and recharging.

(3) Extinguishers may not be replaced, unless authorized by the Disaster Chief or his Assistant.

VII. PREPAREDNESS AND PREVENTION PLAN

C. Fire Inspections

1. Daily inspections should be made by the operating areas to insure proper operation of fire doors, all fire equipment is readily accessible, all fire extinguishers are in place and fire doors are not blocked.

2. A quarterly inspection is made by the Mechanical Department of all fire fighting and protective equipment including fire mains, hose, extinguishers, sprinkler system and fire doors. A copy of the inspection report is routed to each area.

3. The Mechanical Department daily checks the fire alarm system to insure it is operable. Weekly- at 10:00 a.m. on Monday, test alarms are sounded. Test alarms are always preceded by one (1) ring to denote it is a test. The fire pump is operated 30 minutes each Wednesday to insure it is in operable condition.

4. A.D.T. with a Mechanic, checks the A.D.T. detection system every two months. This is always on the second Tuesday. They open a drain valve to each sprinkler system and check their control panel to insure they receive a flow signal.

D. Other Site Programs

Refer to these existing response plans attached to the Contingency Plan and Emergency Procedures (Section VIII).

- Emergency Control Plan A - Fire, Procedure #19-A
- Identification of the Health, Fire and Reactivity of Materials, Procedure #7
- Handling of Hazardous Materials, Procedure #22
- Spill Procedure - Procedure #42
- Hazardous Materials Spill Handling

E. Local Emergency Authorities

1. The type of HW handled at this facility is essentially all ignitable and/or EP toxic for heavy metals. The local authorities, therefore, have a primary concern for fire safety -- as they do for all of the ignitable materials on the site. The Toledo Fire Department (and Rescue Squad) makes an annual visit to the site to re-familiarize themselves with our facilities, hazards, access routes, etc. The latest visit is documented on the attached.

VII. PREPAREDNESS AND PREVENTION PLAN

E. Local Emergency Authorities (continued)

2. Since the police would only have a minor role in traffic control during a fire, they do not regularly visit the plant for familiarization. A letter advising them of our HW storage and the type of emergency they might be called upon to respond to was send (copy attached).

3. Local hospitals have known capabilities for treating burns, smoke inhalation and other injuries from fires. We do not feel there is any other expected type injury from emergency incidents in our HW storage facility. A letter advising them of our HW storage and the type of injuries that might occur from an emergency incident at our facility was sent to several of them (copies attached).

4. The emergency authorities for our plant are:

a. Toledo Fire Department and/or Rescue Squad:	241-1211
b. Toledo Police Department:	243-4141
c. Ambulance	
• Hope	478-5953
• Bunting	475-4606
d. Hospitals	
Flower	885-1444
Mercy	259-1500
Medical College of Ohio	381-3866
Parkwood	242-8471
Riverside	729-5151
St. Charles	698-2511
St. Luke's	893-5911
St. Vincent's	259-4098
Toledo	473-4218

5. The Plant Doctor is Dr. J. R. Stevens - Office: 474-5443
Home: Non-responsive

If the doctor is not available, call the Academy of Medicine: 473-3200

6. We have a contract with ~~Ace Oil Company~~, Associated Chemical & Environmental Services, 876 Otter Creek Road (P.O. Box 7371) Oregon, OH 43616 for emergency response to spills requiring vacuum truck service.

August 5, 1982

J. W. Sbemechko
Hazardous Waste Coordinator

ANNUAL INSPECTION OF PLANT FACILITIES BY TOLEDO FIRE DEPARTMENT

As you are aware, on June 7, 1982, approximately 25 members of the Toledo Fire Department (led by Capt. Mueller) toured the Toledo Plant. I'd like to thank you for your participation on the tour. It was especially helpful having you lead the tour through the hazardous waste pad and the raw material tank farm. Tours such as these help to maintain good relations between the Plant and the Fire Department.

C. J. Szafir, Jr.
Engineering Superintendent

69-7

E. I. DU PONT DE NEMOURS & COMPANY

TOLEDO, OHIO

July 30, 1982

Charles Kahle, M. D.
Director of Emergency Services
St. Vincent Hospital
2213 Cherry St.
Toledo, Ohio 43608

Dear Gentlemen:

As part of our responsibility under the Resource Conservation and Recovery Act of 1976, we are notifying you of the types of hazardous waste we have stored on our plant site and the types of injuries you might be called upon to treat, should an emergency incident occur involving this waste.

We have interim permission to store hazardous waste in containers and tanks prior to recovery or off-site disposal, and are applying for a permit to continue this practice permanently. These wastes and the storage practices are not new to our site, but result from our overall operations over the past 50 years.

The primary hazardous characteristic of these waste is ignitibility. Therefore, the primary danger to persons and the injuries you might be called upon to treat in an emergency is burns. Smoke inhalation is another possibility as with all fires. The level of toxicity for these products of combustion is not considered to be abnormal.

If you would care to visit our site (as the City of Toledo Fire Department does annually) for familiarization with our emergency response capabilities and procedures, we would welcome you.

Please contact C. B. Ogle to arrange such a visit. Our Plant Physician, Dr. J. R. Stevens is also available to discuss this matter.

Very truly yours,

E. I. DU PONT DE NEMOURS & COMPANY

R. H. Clark
R. H. CLARK
PLANT MANAGER

RHC/vw

E. I. DU PONT DE NEMOURS & COMPANY

TOLEDO, OHIO [illegible]

FINISHES DIVISION

July 30, 1982

Bruce Janiak, M. D.
Director of Emergency Services
Toledo Hospital
2142 North Cove Blvd.
Toledo, Ohio 43606

Dear Gentlemen:

As part of our responsibility under the Resource Conservation and Recovery Act of 1976, we are notifying you of the types of hazardous waste we have stored on our plant site and the types of injuries you might be called upon to treat, should an emergency incident occur involving this waste.

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If you would care to visit our site (as the City of Toledo Fire Department does annually) for familiarization with our emergency response capabilities and procedures, we would welcome you.

Please contact C. B. Ogle to arrange such a visit. Our Plant Physician, Dr. J. R. Stevens is also available to discuss this matter.

Very truly yours,

E. I. DU PONT DE NEMOURS & COMPANY

R. H. Clark
R. H. CLARK
PLANT MANAGER

RHC/vw

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT V
CLOSURE PLAN

E.I. duPont deNemours, Inc.
U.S. EPA FACILITY ID #: OHD-005-041-843

TOLEDO PLANT
CLOSURE PLAN
HAZARDOUS WASTE STORAGE FACILITY

I. General

A. Purpose

This plan outlines the steps required to close an Interim Status RCRA storage facility. Included are plans for off-site disposal of all stored waste and decontamination of all surfaces and tanks.

B. Applicable Regulations

This plan complies with the provisions of 40 CFR Part 265, Sub-Part G. - Closure and Post-Closure, for Interim Status Hazardous Storage Facilities. Specific Sections to be addressed are:

1. 265.111- 265.115; these can be found at 46 FR2875 (January 12, 1981).

2. 265.197, which can be found at 45 FR33245.

C. Organization

This plan covers both general requirements and specific tasks for various types of storage as is appropriate for this site in these sections:

II. Closure Performance Standard
III. Administrative Requirements
IV. Time of Closure
V. Schedule of Closure
VI. Disposal
VII. Decontamination
VIII. Certification
IX. Cost Estimates
X. Specific Closure Activity

A. Drum pads
B. Storage tanks

Section X is prepared in a modular manner for sites with more than one storage area or tank which allow a partial closure of the facility without rewriting the plan.

II. Closure Performance Standard

The environmental standard which governs all hazardous waste management (HWM) facility closings is given in §265.111:

> The owner or operator must close his facility in a manner that:
> (a) Minimizes the need for further maintenance, and
> (b) Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground or surface waters or to the atmosphere.

III. Administrative Requirements

Certain record keeping and other administrative duties relative to closure are specified for the owner/operator of a HWM facility (see § 265.112).

A. This plan must be complete by May 19, 1981, but may be revised at any time during the active life of the facility.

B. It must be amended within 60 days of changes in:

1. Operating plans or facility design which affect the closure plan;
2. Change in the expected year of closure.

C. The written plan and all amendments must be available at the facility until closed and certified.

D. The maximum inventory of waste storage must be documented (see Section II by type of storage).

E. An estimate of the time of closure is required (see section IV)

F. The plan must be submitted to the Regional Administrator at least 180 days before expected closure.

G. The cost of closure must be updated annually for the annual report of the facility to EPA.

IV. Time of Closure

A. This storage facility is on the site of an active production facility for which there has been no forecasted closure. It is expected to receive all Hazardous Waste generated on the site prior to treatment and/or shipment off-site for disposal. Therefore, there can be no estimated closure time now.

B. Closure of the production facility would encompass a phase-out over a period of at least a year or more. This plan will be amended with a specific closure date estimate within 60 days of a firm commitment to cease production and/or stop waste generation.

C. Changes in production volume or process may dictate a partial closing at the site. When these changes are known, an amendment will be made with an estimated closure date.

V. Schedule of Closure

A. The schedule of closure is a list of steps -- some of which are required by regulations (see references in each step) -- which include both administrative and physical closing actions.

B. The time frame for these steps is relative to the date when closure commences and are referenced as C minus x months and C plus y months.

C. The steps of closure are:

Time	Step
1. C minus 10 mos.	Determine when closure is to occur
2. C minus 6-10 mos.	Make any amendments needed; prepare copy for Regional EPA
3. C minus 6 mos.	Submit copy to Regional EPA for approval (§ 265.112)
4. C minus 3 mos.	EPA must have approved or rejected (Ibid.)
5. C minus 1-3 mos.	Conclude contracts, train operators and mechanics as needed.
6. C	Start closure
7. C plus 2 mos.	Determine if closure can be complete in 3 months; if yes, no action; if n apply for an extension (§ 265.113).
8. C plus 3 mos.	Complete closure; obtain certificat

D. When amended for a known closure, the C plus and minus dates will be specified in the plan.

VI. DISPOSAL

A. This section of the plan outlines specifically the disposal site where each Hazardous Waste stream will go and in what type containers. An amendment is necessary whenever the site designated is changed for any reason.

B. The Waste Streams and their disposal site:

1. Still bottoms (F003/F005), drums - ship to Robert Ross & Sons, Inc., Grafton, Ohio, under existing contract of OT-9000, Waste Code WOT-12 - 6385.

2. Waste Paint Liquid (D001, drums - ship to same as above. Waste Code WOT-13 - 6386.

3. Clean out dirty wash solvent tanks (F003/F005, in drums) ship to Systech, Box 266, Paulding, Ohio, under existing contract of Waste Code WOT-16.

VII. DECONTAMINATION

A. This section of the closure plan outlines who will do the necessary decontamination of the storage facilities at closure.

1. Drum pad - plant personnel
2. Solvent tanks - Ace Oil

VIII. Certification

When closure is completed, the owner or operator must submit to the Regional Administrator certification both by the owner or operator and an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

IX. Cost Estimates

A. Regulations require a cost estimate for all costs of carrying out the closure plan be prepared in current (Spring 1981) dollars and escalated or upgraded on the annual report yearly (265.142 (c), 46FR2878, January 12, 1981).

The attached cost estimation sheet(s) cover(s) all the steps in closure of this site and proper disposal of all hazardous waste material on hand at an off-site RCRA location.

B. Estimates are to allow for the maximum inventory as discussed in Section III-D and listed on the attached sheets.

C. Amended or updated sheets are attached in front of the older estimates by type of storage.

REVISED CLOSURE COST ESTIMATES

8-6-82

TOLEDO PLANT

May, 1982 cost rates used; volumes adjusted to reflect the revised estimates and more accurate sizing of tanks in Part B application; includes a specific 10,000 gallon tank proposed to be used for Flint dirty wash solvent storage.

Date 8/6/82 No. D- 1

Supercedes Date 5/5/82

COST OF CLOSURE ESTIMATE
DRUM STORAGE FACILITY
Toledo Plant

A. Name or number of storage pad HW container pad

B. Maximum gallons (permitted capacity) 56,000

C. Cost per drum to send to disposal (including freight) by waste type (use additional sheets if there is more than 3 waste streams):

1. Waste stream Waste Paint Liquid (WCF# 13)

a. Max. No. of drums: see C-3

b. Disposal now at: Robert Ross & Sons
Grafton OH

c. Current contract cost/drum (delivered) $ 24.36

d. Total Cost (AXC) $ _____

2. Waste stream Still Bottoms (WCF# 12)

a. Max. No. of drums: see C-3

b. Disposal now at: Robert Ross & Sons
Grafton OH

c. Current contract cost/drum (delivered) $ 24.36

d. Total Cost (AXC) $ _____

3. Waste stream all of above plus misc. (WCF# —)

a. Max. No. of drums: 1018

b. Disposal now at: Robert Ross
Grafton, OH

c. Current contract cost/drum (delivered) $ 24.36

d. Total Cost (AXC) $ 24798

D. Decontamination Cost

The estimated cost for clean-up of storage pad (scrape, wash, flush, dry with absorbent, etc. -- or whatever is needed) of any spill, leak, drip, or residue of the stored hazardous waste: $ 109.

E. Total cost of closure (C1d, C2d, etc., plus D) $ 24,907.

Date 8/6/82 No. T -1

Supercedes Date 5/5/82

COST OF CLOSURE ESTIMATE
TANK STORAGE FACILITY
Toledo Plant

A. Name or number of storage tank(s) TK1-A1

B. Maximum gallons (permitted capacity) 750

C. Cost per gallon to send to disposal (including freight; use additional sheets if there is more than 1 tank unless all tank contents are the same):

1. Waste stream Dirty Wash Solvent (WCF# 16)
2. No. of drums to drain (maximum) 14
3. Estimated No. of drums for decontamination material 2
4. Disposal now at: Systems Technology VJ
   Box 266
   Paulding OH
5. Current contract cost per drum (delivered): RS 21.58] 40.66
6. Current cost of drum to be used: $ 19.08 each
7. Total cost: (2 + 3) x (5 + 6) = $ 650.56

D. Decontamination Cost

The estimated cost to thoroughly remove all traces (in addition to costs in C above:

1. Labor (plant or contract) $ 632
2. Materials (to neutralize, flush, etc.) $ 339
3. Drums (see C3, 5 & 6 above)
4. Other $ 327

E. Total cost of closure (C7 plus D 1,2,& 4) $ 1,949.

Date 8/6/82 No. T-2

Supercedes Date 5/5/82

COST OF CLOSURE ESTIMATE
TANK STORAGE FACILITY
TOLEDO PLANT

A. Name or number of storage tank(s) TK2-8G1

B. Maximum gallons (permitted capacity) 5000

C. Cost per gallon to send to disposal (including freight; use additional sheets if there is more than 1 tank unless all tank contents are the same):

1. Waste stream Dirty Wash Solvent (WCF# 16)
2. No. of drums to drain (maximum) 91
3. Estimated No. of drums for decontamination material 5
4. Disposal now at: Systems Technology
   Box 266
   Paulding, OH
5. Current contract cost per drum (delivered): RS 21.58] 40.66
6. Current cost of drum to be used: $ 19.08 each
7. Total cost: (2 + 3) x (5 + 6) = $ 3,903

D. Decontamination Cost

The estimated cost to thoroughly remove all traces (in addition to costs in C above:

1. Labor (plant or contract) $ 2529
2. Materials (to neutralize, flush, etc.) $ 1991
3. Drums (see C3, 5 & 6 above)
4. Other $ see T-1

E. Total cost of closure (C7 plus D 1,2,& 4) $ 8423

Date 8/6/82 No. T-3

Supercedes Date 5/5/82

COST OF CLOSURE ESTIMATE
TANK STORAGE FACILITY
TOLEDO PLANT

A. Name or number of storage tank(s) TK 9, TK 10, TK 15

B. Maximum gallons (permitted capacity) 3350

C. Cost per gallon to send to disposal (including freight; use additional sheets if there is more than 1 tank unless all tank contents are the same):

1. Waste stream Dirty Wash Solvent (WCF# 16)
2. No. of drums to drain (maximum) 61
3. Estimated No. of drums for decontamination material 2
4. Disposal now at: Systems Technology
   Box 266
   Paulding, OH
5. Current contract cost per drum (delivered): RS 21.58] 40.66
6. Current cost of drum to be used: $ 19.08 each
7. Total cost: (2 + 3) x (5 + 6) = $ 2,562.

D. Decontamination Cost

The estimated cost to thoroughly remove all traces (in addition to costs in C above:

1. Labor (plant or contract) $ 1897
2. Materials (to neutralize, flush, etc.) $ 1592
3. Drums (see C3, 5 & 6 above)
4. Other $ see T-1

E. Total cost of closure (C7 plus D 1,2,& 4) $ 6,051

Date 8/6/82 No. T-4

Supercedes Date new (Separation of Tanks)

COST OF CLOSURE ESTIMATE
TANK STORAGE FACILITY
TOLEDO PLANT

A. Name or number of storage tank(s) TK13

B. Maximum gallons (permitted capacity) 3000

C. Cost per gallon to send to disposal (including freight; use additional sheets if there is more than 1 tank unless all tank contents are the same):

1. Waste stream Dirty Wash Solvent (WCF= 16)
2. No. of drums to drain (maximum) 55
3. Estimated No. of drums for decontamination material 2
4. Disposal now at: Systems Technology
   Box 266
   Pandora, OH
5. Current contract cost per drum (delivered): RS 21.55 } 40.86
6. Current cost of drum to be used: $ 19.08 each
7. Total cost: (2 + 3) x (5 + 6) = $ 2,318.

D. Decontamination Cost

The estimated cost to thoroughly remove all traces (in addition to costs in C above:

1. Labor (plant or contract) $ 1897
2. Materials (to neutralize, flush, etc.) $ 1572
3. Drums (see C3, 5 & 6 above)
4. Other $ see T-1

E. Total cost of closure (C7 plus D 1,2,& 4) $ 5707.

Date 8/6/82 No. T-5

Supercedes Date 5/5/82

COST OF CLOSURE ESTIMATE
TANK STORAGE FACILITY
TOLEDO PLANT

A. Name or number of storage tank(s) TK14 (FLINTWASH - PROPOSED)

B. Maximum gallons (permitted capacity) 19000

C. Cost per gallon to send to disposal (including freight; use additional sheets if there is more than 1 tank unless all tank contents are the same):

1. Waste stream Dirty Wash Solvent (WCF# 16)
2. No. of drums to drain (maximum) 182
3. Estimated No. of drums for decontamination material 4
4. Disposal now at: Systems Technology
   Box 266
   Paulding, OH
5. Current contract cost per drum (delivered): RS 21.58] 40.66
6. Current cost of drum to be used: $ 19.08 each
7. Total cost: (2 + 3) x (5 + 6) = $ 7563.

D. Decontamination Cost

The estimated cost to thoroughly remove all traces (in addition to costs in C above:

1. Labor (plant or contract) $ 763
2. Materials (to neutralize, flush, etc.) $ 436
3. Drums (see C3, 5 & 6 above)
4. Other Certification $ 55

E. Total cost of closure (C7 plus D 1,2,& 4) $ 8,817

Date 8/6/82 No. T-6

Supercedes Date new (separates tanks)

COST OF CLOSURE ESTIMATE
TANK STORAGE FACILITY
TOLEDO PLANT

A. Name or number of storage tank(s) TK 11 & TK 12

B. Maximum gallons (permitted capacity) 1720

C. Cost per gallon to send to disposal (including freight; use additional sheets if there is more than 1 tank unless all tank contents are the same):

1. Waste stream Dirty Wash Solvent (WCF# 16)
2. No. of drums to drain (maximum) 32
3. Estimated No. of drums for decontamination material 2
4. Disposal now at: Systems Technology
Box 266
Paulding, OH
5. Current contract cost per drum (delivered): RS 21.58] 40.66
6. Current cost of drum to be used: $ 19.08 each
7. Total cost: (2 + 3) x (5 + 6) = $ 1,382.

D. Decontamination Cost

The estimated cost to thoroughly remove all traces (in addition to costs in C above:

1. Labor (plant or contract) $ 632
2. Materials (to neutralize, flush, etc.) $ 339
3. Drums (see C3, 5 & 6 above)
4. Other $ See T-1

E. Total cost of closure (C7 plus D 1,2,& 4) $ 2353.

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT VI
TANK OPERATING PROCEDURES

E.I. duPont deNemours, Inc.
U.S. EPA FACILITY ID #: OHD-005-041-843

E-23(2)(C). TANK OVERFILLING CONTROL EQUIPMENT

THE TANKS HAVE LEVEL GAGES AND/OR HIGH LEVEL ALARMS WHICH ARE OBSERVED DAILY WHEN THE EQUIPMENT IS IN OPERATION (SEE E-2A(2)). NO DANGER EXISTS TO HUMANS OR THE ENVIRONMENT, EXCEPT IGNITION (SEE B-1), EVEN IF THE LEVEL EQUIPMENT SHOULD ALLOW OVERFLOW SOME SPENT SOLVENT. OUR SPILL PLAN AND NORMAL PRACTICES WOULD MORE THAN ADEQUATELY COPE WITH THIS DANGER POTENTIAL.

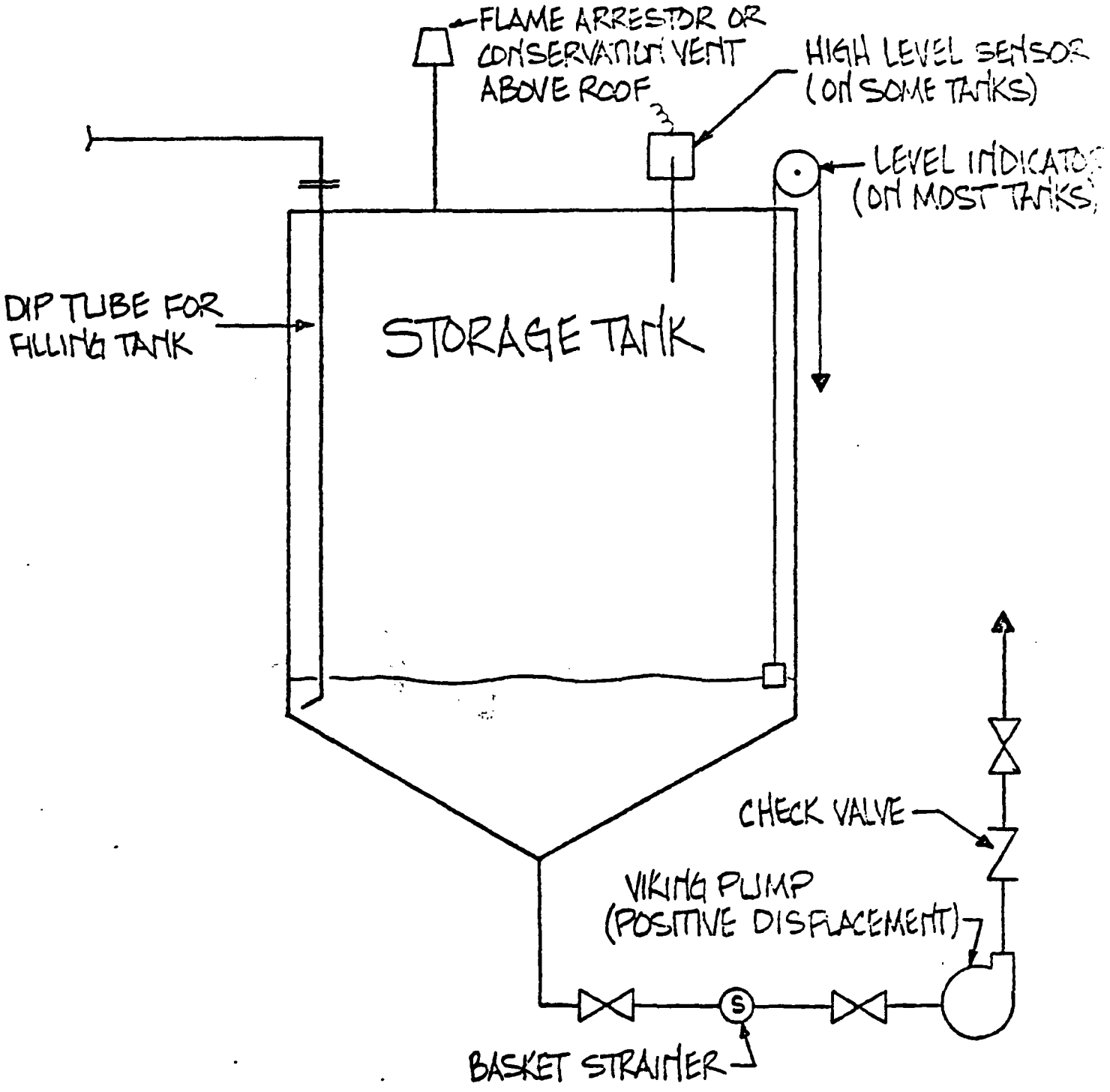
OHD 035041843

INSPECTION OF THE LEVEL CONTROLS/DEVICES BY OPERATING PERSONNEL IS DONE EVERY DAY.

RCRA REPORT OHDCOSCAH343

TYPICAL STORAGE TANK

TOLEDO FEFP PLANT MR. PILE AUG 2 82



TYPICAL STORAGE TANK

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT VII
PROCEDURES FOR IGNITABLE WASTE

E.I. duPont deNemours, Inc.
U.S. EPA FACILITY ID #: OHD-005-041-843

WE ESSENTIALLY HAVE NO INCOMPATIBLE HW WASTES ON THE SITE. ALL HW'S ARE COMPATIBLE WITH THE DRUMS USED FOR STORAGE/OFF-SITE SHIPMENT.

F-5E. MANAGEMENT OF IGNITABLE OR REACTIVE WASTES IN TANKS

THE HW IN TANKS IS ALL DIRTY WASH SOLVENT AND IS IGNITABLE IN NATURE. THERE IS NO REACTIVE WASTE ON THE SITE THAT WOULD EVER BE PLACED IN TANKS. THE TANKS AND PIPING ARE BONDED TOGETHER AND GROUNDED TO PREVENT STATIC BUILD-UP AND POSSIBLE IGNITION. ADDITIONS TO THE TANKS ARE MADE BY POURING FROM A CONTAINER GROUNDED TO THE TANK OR BY USING A GROUNDED HOSE/PUMP COMBINATION FROM A GROUNDED CONTAINER. ALL TANKS ARE VENTED TO THE ATMOSPHERE THROUGH PIPES FITTED WITH CONSERVATION TYPE FLAME ARRESTOR VENTS. THIS COMBINATION OF PROCEDURES AND EQUIPMENT HAS BEEN SATISFACTORILY USED FOR DECADES OF HANDLING IGNITABLE MATERIALS IN THE PLANT.

F-5F. MANAGEMENT OF INCOMPATIBLE WASTES IN TANKS

ALL THE SPENT WASH SOLVENTS PLACED IN THESE TANKS ARE KNOWN TO BE COMPATIBLE FROM YEARS OF EXPERIENCE AND WCF'S.

F-5G & H. MANAGEMENT OF WASTE PILES

THERE ARE NO WASTE PILES ON THIS SITE.

HAZARDOUS WASTE MANAGEMENT PERMIT
ATTACHMENT VIII
SECONDARY CONTAINMENT PROCEDURES

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PALLETS OF HW ARE PLACED IN THE DIKED STORAGE AGAINST THE CURB LINE--TWO PALLETS DEEP AND THREE PALLETS HIGH (AISLE MARKINGS ARE CLEAR TO THE FORK TRUCK OPERATOR). THIS PLACEMENT ALLOWS OBSERVATION OF THE PALLET STACK FROM BOTH SIDES DURING WEEKLY INSPECTIONS. ONE FORK TRUCK AT A TIME OPERATES IN THE AREA TO REDUCE CHANCE OF ACCIDENTS. CONTAINERS ARE NOT NORMALLY DATED SINCE THE HW STORAGE FACILITY HAS NO TIME LIMIT ON SUBSEQUENT MOVEMENT. HOWEVER, AS SOON AS AN ECONOMICAL LOAD DESTINED FOR A PARTICULAR CONTRACT DISPOSER HAS BEEN ACCUMULATED, THE ARRANGEMENTS ARE MADE FOR PROMPT SHIPMENT.

D-1A(3). SECONDARY CONTAINMENT SYSTEM DESIGN AND OPERATION

THE HW STORAGE AREA FOR CONTAINERS IS LOCATED ON THE EAST SIDE OF A LARGE PAD ORIGINALLY CONSTRUCTED TO HOLD IGNITABLE LIQUID (FINISHED PRODUCTS) CONTAINERS. THE PAD IS 310 FEET BY 112 FEET AND THE PORTION DESIGNATED FOR HW IS 310 FEET BY 15 FEET. THE ATTACHED DRAWINGS SHOW THE PAD AREA, ELEVATION OF CURBING, DRAINAGE SYSTEM, RETENTION BASIN, AND OUTLET VALVE. ACCESS BY FORK TRUCK IS ON DOWN-SLOPING RAMPS.

D-1A(3)(A). REQUIREMENT FOR THE BASE TO CONTAIN LIQUIDS

THE BASE IS CONCRETE--CRACK AND GAP FREE, ABOUT 8" THICK, AND SLOPED TO A SERIES OF DRAINS. THE CONCRETE CURBING RANGES FROM 6" TO 12" HIGH (HIGHER WHERE PAD SLOPES DOWNWARD THAN AT THE ENDS). THE HW'S STORED ON THE PAD (AS ARE THE FINISHED PRODUCTS) ARE COMPOSED LARGELY OF ORGANIC SOLVENTS WHICH HAVE NO CORROSION OR CHEMICAL EFFECT ON THE CONCRETE. THE AMOUNT OF ORGANIC SOLVENT MIGRATION THROUGH THE BASE WOULD BE MINIMAL IN LIGHT OF THE SHORT PERIOD OF EXPOSURE (DAILY SURVEILLANCE--WEEKLY

INSPECTION).

D-1A(3)(B). CONTAINMENT SYSTEM DRAINAGE

AS INDICATED IN D-1A(1), ALL CONTAINERS ARE ON 5" HIGH WOODEN PALLETS EXCEPT THE PORTABLE TANKS (MAGNESIUM OR ALUMINUM) WHICH HAVE 8" LEGS. THIS DUNNAGE (OR METAL LEGS) COMBINED WITH THE SLOPE TOWARD THE DRAINS WILL INSURE THAT THE CONTAINERS WILL NOT BE IN CONTACT WITH RAIN WATER OR POSSIBLE HW LEAKAGE.

D-1A(3)(C). CONTAINMENT SYSTEM CAPACITY

FROM THE ATTACHED DRAININGS, THE VOLUME OF LIQUID WHICH CAN BE CONTAINED ON THE PAD BEHIND RETENTION BASIN RELEASE VALVE IS 424,000 GALLONS. THE HW STORAGE CAPACITY IN ITS DESIGNATED AREA IS 56,000 GALLONS. THE SECONDARY CONTAINMENT SYSTEM WILL HOLD 757% OF THE MAXIMUM HW GALLONAGE, THUS WELL EXCEEDING THE 10% REQUIREMENTS OF 40 CFR 264.175(A)(3). A SAFETY FACTOR IN THIS SYSTEM IS THE ALMOST IMPOSSIBLE PROBABILITY THAT THE WORST ACCIDENT COULD RUPTURE AND RELEASE THE CONTENTS OF 102 HW DRUMS AT ONCE (10% OF TOTAL HW DRUMS).

D-1A(3)(D). CONTROL OF RUN-ON

VERY LITTLE RAIN WILL RUN ONTO THE PAD DUE TO THE CURBING AROUND MOST OF THE PAD AND RELATIVELY FLAT ROADWAYS ON TWO SIDES WHERE THE SLOPING RAMPS FOR FORK TRUCK ACCESS ARE LOCATED. AS THE FIGURES IN D-1A(3)(C) INDICATE, THERE IS ADEQUATE EXCESS CAPACITY FOR ANY PRECIPITATION--DIRECT OR RUN-ON.

D-1A(4). REMOVAL OF LIQUIDS FROM CONTAINMENT SYSTEM

WITH THE RETENTION BASIN OUTLET VALVE CLOSED, ANY PRECIPITATION--EVEN ASSUMING NO LEAKS OF HW OR FINISHED PRODUCT--WILL CAUSE A BUILD UP OF WATER IN THE DRAINAGE SYSTEM.

AREA OPERATING PROCEDURE (AOP) NO. 655.000, WHICH OUTLINES HOW TO SAMPLE AND EVALUATE THIS ACCUMULATED WATER BEFORE RELEASE, IS ATTACHED. THE KEY POINTS ARE:

- LEVEL CHECKS TO BE MADE:
  - EVERY FRIDAY TO INSURE MINIMAL AMOUNT IN RETENTION BASIN TO START WEEKEND.
  - AFTER EVERY MAJOR STORM.
- SAMPLE NEAR SURFACE.
- POUR INTO A GLASS JAR AND ALLOW TO SIT 5 MINUTES.
- OBSERVE FOR:
  - ODOR OF SOLVENTS, RESINS, PAINTS
  - PHASE SEPARATION (ORGANICS TO TOP)
  - CLOUD FROM PARTIALLY MISCIBLE ORGANICS
  - COLORATION DUE TO PIGMENTATION
- IF ANY INDICATION OF ORGANICS IS PRESENT, TAKE SAMPLE TO LAB AND RUN GAS CHROMATOGRAM FOR TOLUENE, XYLENE AND ACETONE.
- IF NO ORGANICS ARE INDICATED, RELEASE TO SEWER AND IMMEDIATELY CLOSE THE VALVE.
- RECORD OBSERVATIONS AND RELEASE ON OPERATING RECORD LOG (SAMPLE ATTACHED).
- IF THE WATER CONTAINS SIGNIFICANT AMOUNTS ORGANICS, THE SITE SOLID WASTE COORDINATOR AND PLANT ENGINEERING SUPERINTENDENT MUST DECIDE ON APPROPRIATE DISPOSAL DEPENDING ON CONCENTRATION AND IDENTIFY FOUND IN THE LAB TEST:
  - PUMP OUT FOR POTW